

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

[REDACTED]

Plaintiff,

v.

No. 17 Civ. 00616 (JGK)

JEFFREY EPSTEIN, GHISLAINE MAXWELL,
[REDACTED], LESLEY GROFF and

[REDACTED],
[REDACTED],

Defendants.

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANTS**

Plaintiff, by and through her undersigned counsel, hereby propounds Plaintiff's First Request for Production of Documents pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure to the Defendants. The responses are due at the offices of Boies Schiller Flexner LLP, 575 Lexington Avenue, 7th Floor, New York, NY 10022, within thirty (30) days of service hereof.

DEFINITIONS

Wherever they hereafter appear the following words and phrases have the following meanings:

1. "Agent" shall mean any agent, employee, officer, director, attorney, independent contractor or any other person acting, or purporting to act, at the discretion of or on behalf of another.
2. "Correspondence" or "communication" shall mean all written or verbal communications, by any and all methods, including without limitation, letters, memoranda,

representations of any kind, and electronic “writings” and “recordings” as set forth in the Federal Rules of Evidence, including but not limited to, originals or copies where originals are not available. Any document with any marks such as initials, comments or notations of any kind of not deemed to be identical with one without such marks and is produced as a separate document. Where there is any question about whether a tangible item otherwise described in these requests falls within the definition of “document” such tangible item shall be produced.

5. “Employee” includes a past or present officer, director, agent or servant, including any attorney (associate or partner) or paralegal.

6. “Including” means including without limitations.

7. “Person(s)” includes natural persons, proprietorships, governmental agencies, corporations, partnerships, trusts, joint ventures, groups, associations, organizations or any other legal or business entity.

8. “You” or “Your” hereinafter means Ghislaine Maxwell, Jeffrey Epstein, Lesley Groff, [REDACTED] [REDACTED], and any alias, employee, agent, attorney, consultant, related entities or other representative of Ghislaine Maxwell, Jeffrey Epstein, Lesley Groff, and [REDACTED] [REDACTED].

INSTRUCTIONS

1. Unless indicated otherwise, the Relevant Period for this Request is from September 2006 to present. A Document should be considered to be within the relevant time frame if it refers or relates to communications, meetings or other events or documents that occurred or were created within that time frame, regardless of the date of creation of the responsive Document.

2. This Request calls for the production of all responsive Documents in your possession, custody or control without regard to the physical location of such documents.

3. If any Document requested was in any defendants' possession or control, but is no longer in its possession or control, state what disposition was made of said Document, the reason for such disposition, and the date of such disposition.

4. For the purposes of reading, interpreting, or construing the scope of these requests, the terms used shall be given their most expansive and inclusive interpretation. This includes, without limitation the following:

- a) Wherever appropriate herein, the singular form of a word shall be interpreted as plural and vice versa.
- b) "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope hereof any information (as defined herein) which might otherwise be construed to be outside the scope of this discovery request.
- c) "Any" shall be understood to include and encompass "all" and vice versa.
- d) Wherever appropriate herein, the masculine form of a word shall be interpreted as feminine and vice versa.
- e) "Including" shall mean "including without limitation."

5. If you are unable to answer or respond fully to any document request, answer or respond to the extent possible and specify the reasons for your inability to answer or respond in full. If the recipient has no documents responsive to a particular Request, the recipient shall so state.

6. Unless instructed otherwise, each Request shall be construed independently and not by reference to any other Request for the purpose of limitation.

7. The words "relate," "relating," "relates," or any other derivative thereof, as used herein includes concerning, referring to, responding to, relating to, pertaining to, connected with, comprising, memorializing, evidencing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing or constituting.

8. "Identify" means, with respect to any "person," or any reference to the "identity" of any "person," to provide the name, home address, telephone number, business name, business address, business telephone number and a description of each such person's connection with the events in question.

9. "Identify" means, with respect to any "document," or any reference to stating the "identification" of any "document," provide the title and date of each such document, the name and address of the party or parties responsible for the preparation of each such document, the name and address of the party who requested or required the preparation and on whose behalf it was prepared, the name and address of the recipient or recipients to each such document and the present location of any and all copies of each such document, and the names and addresses of all persons who have custody or control of each such document or copies thereof.

10. In producing Documents, if the original of any Document cannot be located, a copy shall be produced in lieu thereof, and shall be legible and bound or stapled in the same manner as the original.

11. Any copy of a Document that is not identical shall be considered a separate document.

12. If any requested Document cannot be produced in full, produce the Document to the extent possible, specifying each reason for your inability to produce the remainder of the Document stating whatever information, knowledge or belief which you have concerning the portion not produced.

13. If any Document requested was at any one time in existence but are no longer in existence, then so state, specifying for each Document (a) the type of document; (b) the types of information contained thereon; (c) the date upon which it ceased to exist; (d) the circumstances

under which it ceased to exist; (e) the identity of all person having knowledge of the circumstances under which it ceased to exist; and (f) the identity of all persons having knowledge or who had knowledge of the contents thereof and each individual's address.

14. All Documents shall be produced in the same order as they are kept or maintained by you in the ordinary course of business.

15. You are requested to produce all drafts and notes, whether typed, handwritten or otherwise, made or prepared in connection with the requested Documents, whether or not used.

16. Documents attached to each other shall not be separated.

17. Documents shall be produced in such fashion as to identify the department, branch or office in whose possession they were located and, where applicable, the natural person in whose possession they were found, and business address of each Document's custodian(s).

18. If any Document responsive to the request is withheld, in all or part, based upon any claim of privilege or protection, whether based on statute or otherwise, state separately for each Document, in addition to any other information requested: (a) the specific request which calls for the production; (b) the nature of the privilege claimed; (c) its date; (d) the name and address of each author; (e) the name and address of each of the addresses and/or individual to whom the Document was distributed, if any; (f) the title (or position) of its author; (g) type of tangible object, *e.g.*, letter, memorandum, telegram, chart, report, recording, disk, etc.; (h) its title and subject matter (without revealing the information as to which the privilege is claimed); (i) with sufficient specificity to permit the Court to make full determination as to whether the claim of privilege is valid, each and every fact or basis on which you claim such privilege; and (j) whether the document contained an attachment and to the extent you are claiming a privilege as to the attachment, a separate log entry addressing that privilege claim.

19. If any Document requested herein is withheld, in all or part, based on a claim that such Document constitutes attorney work product, provide all of the information described in Instruction No. 18 and also identify the litigation in connection with which the Document and the information it contains was obtained and/or prepared.

20. Plaintiff does not seek and does not require the production of multiple copies of identical Documents.

21. This Request is deemed to be continuing. If, after producing these Documents, you obtain or become aware of any further information, Documents, things, or information responsive to this Request, you are required to so state by supplementing your responses and producing such additional Documents to Plaintiff.

DOCUMENTS REQUESTED

DOCUMENT REQUEST NO. 1 (Directed to All Defendants)

A copy of your passport from 2000-2008.

DOCUMENT REQUEST NO. 2 (Directed to Maxwell, [REDACTED] and Groff)

All documents relating to communications with Jeffrey Epstein from 1999 – present.

DOCUMENT REQUEST NO. 3 (Directed to All Defendants)

All documents relating to communications with [REDACTED] from September 2006 – present.

DOCUMENT REQUEST NO. 4 (Directed to All Defendants)

All documents relating to [REDACTED], including, but not limited to, all photographs, travel documents, notes, and electronic communications.

DOCUMENT REQUEST NO. 5 (Directed to All Defendants)

All documents evidencing money paid to [REDACTED] at any time.

DOCUMENT REQUEST NO. 6 (Directed to All Defendants)

All documents relating to the Fashion Institute of Technology (“F.I.T.”).

DOCUMENT REQUEST NO. 7 (Directed to All Defendants)

All communications with F.I.T. related in any way to [REDACTED].

DOCUMENT REQUEST NO. 8 (Directed to All Defendants)

All communications on the Limited Brands server that contain the name [REDACTED].

DOCUMENT REQUEST NO. 9 (Directed to All Defendants)

All communications on the Limited Brands server that contain the name [REDACTED] [REDACTED].

DOCUMENT REQUEST NO. 10 (Directed to All Defendants)

All communications on the Limited Brands server that contain the name Ghislaine Maxwell.

DOCUMENT REQUEST NO. 11 (Directed to All Defendants)

All documents relating to any essays or applications that you provided to [REDACTED] or that she provided to anyone.

DOCUMENT REQUEST NO. 12 (Directed to Maxwell, [REDACTED] and Groff)

All documents evidencing money paid to you by Jeffrey Epstein.

DOCUMENT REQUEST NO. 13 (Directed to Maxwell, [REDACTED] and Groff)

All documents evidencing money paid to you by a company controlled, owned, or directed by Jeffrey Epstein.

DOCUMENT REQUEST NO. 14 (Directed to All Defendants)

All documents evidencing your actual employer in 2006.

DOCUMENT REQUEST NO. 15 (Directed to All Defendants)

All documents evidencing your actual employer in 2007.

DOCUMENT REQUEST NO. 16 (Directed to All Defendants)

All tax returns and supporting documentation filed by you from 2002-2008.

DOCUMENT REQUEST NO. 17 (Directed to All Defendants)

All tax returns and supporting documentation filed by you from 2015-2017.

DOCUMENT REQUEST NO. 18 (Directed to All Defendants)

All documents relating to communications with [REDACTED] [REDACTED] from September 2006 – present.

DOCUMENT REQUEST NO. 19 (Directed to All Defendants)

All documents relating to communications with any named Defendant from January 1, 2000 – present.

DOCUMENT REQUEST NO. 20 (Directed to All Defendants)

All joint defense agreements ever in place between you and any of the other named Defendants.

DOCUMENT REQUEST NO. 21 (Directed to All Defendants)

All common interest agreements ever in place between you and any of the other named Defendants.

DOCUMENT REQUEST NO. 22 (Directed to All Defendants)

All documents evidencing you having a common interest privilege with any of the other named Defendants.

DOCUMENT REQUEST NO. 23 (Directed to All Defendants)

All documents relating to communications with Alan Dershowitz from 1997- present.

DOCUMENT REQUEST NO. 24 (Directed to All Defendants)

All documents relating to communications with a female by the first name “[REDACTED]” from September 2006- present.

DOCUMENT REQUEST NO. 25 (Directed to All Defendants)

All documents relating to massages, including but not limited to any documents reflecting recruiting or hiring masseuses, advertising for masseuses, flyers created for distribution at high schools or colleges, and records reflecting e-mails or calls to individuals relating to massages.

DOCUMENT REQUEST NO. 26 (Directed to All Defendants)

All documents relating to communications with any of the following individual from 1999 – present: Jean Luc Brunel and [REDACTED] [REDACTED].

DOCUMENT REQUEST NO. 27 (Directed to All Defendants)

All video tapes, audio tapes, photographs or any other print or electronic media relating to females under the age of 18, who are not family members, from the period of 2000 – present.

DOCUMENT REQUEST NO. 28 (Directed to All Defendants)

All documents relating to your travel from the period of 2000 – present, including but not limited to, any travel on Jeffrey Epstein’s planes, commercial flights, helicopters, and records indicating passengers traveling with you, hotel records, and credit card receipts.

DOCUMENT REQUEST NO. 29 (Directed to All Defendants)

All documents relating to payments made from Jeffrey Epstein or any related entity to any of the Defendants from 2000 – present, including payments for work performed, gifts, bonuses, vehicles, living expenses, and payments to your charitable endeavors including the TerraMar project.

DOCUMENT REQUEST NO. 30 (Directed to Maxwell, ██████ and Groff)

All documents relating to or describing any work you performed with Jeffrey Epstein, or any affiliated entity from 2000 - present. Including but not limited to, resumes, biographies, employment applications, loan applications, insurance applications and profiles.

DOCUMENT REQUEST NO. 31 (Directed to Maxwell, ██████ and Groff)

All confidentiality agreements between you and Jeffrey Epstein or any entity to which he is related or involved or such agreements which are or were in your possession or control related to any other employee of Jeffrey Epstein, or any associated entity.

DOCUMENT REQUEST NO. 32 (Directed to All Defendants)

All documents from you, your attorneys or agents to any law enforcement entity, or from any law enforcement entity to you or any representative related to any cooperation, potential charge, immunity or deferred prosecution, to which relates to suspected or known criminal activity.

DOCUMENT REQUEST NO. 33 (Directed to All Defendants)

All documents relating to travel of any female, who is not family member, from the period of 2000 – present, who traveled on any of Jeffrey Epstein planes or whose travel was paid for by Jeffrey Epstein or any entity he controlled.

DOCUMENT REQUEST NO. 34 (Directed to All Defendants)

All flight logs or passenger manifests for any aircraft owned or controlled by Jeffrey Epstein.

DOCUMENT REQUEST NO. 35 (Directed to All Defendants)

All flight logs or passenger manifests for any aircraft owned or controlled by any of the Defendants in this action.

DOCUMENT REQUEST NO. 36 (Directed to All Defendants)

All flight logs or passenger manifests for any aircraft owned or controlled by any entity associated with any of the Defendants.

DOCUMENT REQUEST NO. 37 (Directed to Maxwell, [REDACTED] and Groff)

All video tapes, audio tapes, photographs or any other print or electronic media taken at any time when you were in Jeffrey Epstein's company between January 2006 and December 2007.

DOCUMENT REQUEST NO. 38 (Directed to All Defendants)

All video tapes, audio tapes, photographs, or any other print or electronic media taken inside any residence belonging to Jeffrey Epstein between January 2006 and December 2007.

DOCUMENT REQUEST NO. 39 (Directed to All Defendants)

All video tapes, audio tapes, photographs, or any other print or electronic media taken inside or outside of any aircraft belonging to Jeffrey Epstein.

DOCUMENT REQUEST NO. 40 (Directed to All Defendants)

All video tapes, audio tapes, photographs, or any other print or electronic media taken on Little St. James Island.

DOCUMENT REQUEST NO. 41 (Directed to All Defendants)

All computers, hard drives or copies thereof for all computers in operation between 2006 – 2007.

DOCUMENT REQUEST NO. 42 (Directed to All Defendants)

All video tapes, audio tapes, photographs or any other print or electronic media relating to [REDACTED].

DOCUMENT REQUEST NO. 43 (Directed to Maxwell, [REDACTED] and Groff)

All documents relating to any credit cards used that were paid for by Jeffrey Epstein or any related entity from 2000 – present.

DOCUMENT REQUEST NO. 44 (Directed to All Defendants)

All telephone records associated with you, including cell phone records from January 1, 2006 – December 31, 2007.

DOCUMENT REQUEST NO. 45 (Directed to All Defendants)

All telephone records associated with you, including cell phone records from January 1, 2016 – present.

DOCUMENT REQUEST NO. 46 (Directed to All Defendants)

All documents relating to calendars, schedules or appointments for you from January 1, 2006 – December 31, 2007.

DOCUMENT REQUEST NO. 47 (Directed to All Defendants)

All documents identifying any location you resided or stayed overnight from September 2006-May 2007.

DOCUMENT REQUEST NO. 48 (Directed to All Defendants)

All documents relating to calendars, schedules or appointments for Jeffrey Epstein from 2000-present.

DOCUMENT REQUEST NO. 49 (Directed to All Defendants)

All documents relating to contact lists, phone lists or address books for you or Jeffrey Epstein from 2000 – present.

DOCUMENT REQUEST NO. 50 (Directed to All Defendants)

All documents relating to Caroline, a minor from Sweden who was on Jeffrey Epstein's island in or around 2004 - 2005.

DOCUMENT REQUEST NO. 51 (Directed to All Defendants)

All documents or communications identifying the names of all people who traveled to Little St. James Island between January 2006 and December 2007.

DOCUMENT REQUEST NO. 52 (Directed to All Defendants)

All documents evidencing anyone who was under the age of twenty five (25) who ever visited Little St. James Island.

DOCUMENT REQUEST NO. 53 (Directed to All Defendants)

All documents identifying all employees who worked on Little St. James Island between August 2006 and May 2007.

DOCUMENT REQUEST NO. 54 (Directed to All Defendants)

All documents identifying all individuals who resided or stayed at 301 East 66th Street, New York, New York between August 2006 and May 2007.

DOCUMENT REQUEST NO. 55 (Directed to All Defendants)

All documents identifying all individuals who resided or stayed at 9 East 71st Street, New York, New York between August 2006 and May 2007.

DOCUMENT REQUEST NO. 56 (Directed to All Defendants)

All documents relating to any passport for [REDACTED].

DOCUMENT REQUEST NO. 57 (Directed to All Defendants)

All documents relating to any gifts or monetary payments provided to [REDACTED] by you, Jeffrey Epstein or any related entity.

DOCUMENT REQUEST NO. 58 (Directed to All Defendants)

All documents relating to [REDACTED] employment or work as an independent contractor with Jeffrey Epstein or any related entity.

DOCUMENT REQUEST NO. 59 (Directed to All Defendants)

All documents identifying any individuals that [REDACTED] provided a massage to from September 2006 to May 2007.

DOCUMENT REQUEST NO. 60 (Directed to All Defendants)

All documents relating to any employee lists or records associated with you, Jeffrey Epstein or any related entity.

DOCUMENT REQUEST NO. 61 (Directed to All Defendants)

All documents relating to Victoria Secret, models or actresses, who were ever in the presence of you or Jeffrey Epstein from 2000- present.

DOCUMENT REQUEST NO. 62 (Directed to All Defendants)

All travel records between 2000 and the present reflecting your presence in: (a) Palm Beach, Florida or immediately surrounding areas; (b) 9 E. 71st Street, New York, NY 10021; (c) New Mexico; (d) U.S. Virgin Islands; (e) any jet or aircraft owned or controlled by Jeffrey Epstein.

DOCUMENT REQUEST NO. 63 (Directed to All Defendants)

All documents relating to any statement you have made about [REDACTED] to a third party.

DOCUMENT REQUEST NO. 64 (Directed to All Defendants)

All correspondence exchanged between lawyers for Jeffrey Epstein and the United States Government including all draft indictments.

DOCUMENT REQUEST NO. 65 (Directed to All Defendants)

All correspondence exchanged between lawyers for [REDACTED] [REDACTED] and the United States Government including all draft indictments.

DOCUMENT REQUEST NO. 66 (Directed to All Defendants)

All correspondence exchanged between lawyers for Leslie Groff and the United States Government including all draft indictments.

DOCUMENT REQUEST NO. 67 (Directed to All Defendants)

All documents relating to [REDACTED] [REDACTED] (formerly [REDACTED]) from 2000 to present.

Dated: September 19, 2018

Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

/s/ Sigrid McCawley

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¹ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of September, 2018, I served the attached document PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS via Email to the following counsel of record.

Laura A. Menninger, Esq.
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Counsel for Jeffrey Epstein, [REDACTED] [REDACTED] and Lesley Groff

By: /s/ Sigrid McCawley
Sigrid McCawley