

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

CASE NO. 17 Civ 616 (JGK)

JANE DOE 43,

Plaintiff,

vs.

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

Defendants.

ANSWER OF JEFFEY EPSTEIN

Defendant Jeffrey Epstein (“Epstein”), by and through his counsel, answers and responds to Plaintiff [REDACTED] (“Plaintiff” or “[REDACTED]”) First Amended Complaint (the “Complaint”).

PRELIMINARY STATEMENT¹

Epstein enjoys the same protections of the self-incrimination clause of the Fifth Amendment to the United States Constitution (the “Fifth Amendment”) as do all other persons who are subject to criminal prosecution in a jurisdiction in which the Fifth Amendment applies. It is Epstein’s express intent in this Answer to claim the fullest possible protection of the United States Constitution in responding to the Complaint. Epstein does not intend by any of his responses to waive such protection and requests that, in cases of any doubt or ambiguity, his response be construed as an assertion rather than a waiver of such privilege. Epstein also reserves his right to amend his responses without compromising his rights under the Fifth Amendment.

¹ Epstein is not required to respond to the headings set forth in the Complaint since they are not factual allegations.

SUMMARY OF CLAIMS

1. Epstein admits that the Plaintiff purports to bring this lawsuit pursuant to the statutes described in Paragraph 1.

JURISDICTION AND VENUE

2. In response to the allegations in Paragraph 2, Epstein admits that the Plaintiff filed this lawsuit under a pseudonym purportedly for the reasons stated therein.

3. It appears that the allegations in Paragraph 3 are directed to an individual other than Epstein, to which no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer..

4. Epstein admits that he is a citizen of the United States and a resident of the U.S. Virgin Islands. In response to the other allegations in Paragraph 4, Epstein asserts his rights under the Fifth Amendment and declines to answer.

5. Epstein admits that he is an adult male born in 1953. In response to the other allegations in Paragraph 5, Epstein asserts his rights under the Fifth Amendment and declines to answer.

6. It appears that the allegations in Paragraph 6 are directed to an individual other than Epstein, to which no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

7. It appears that the allegations in Paragraph 7 are directed to an individual other than Epstein, to which no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

8. It appears that the allegations in Paragraph 8 are directed to an individual other than Epstein, to which no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

9. It appears that the allegations in Paragraph 9 state conclusions of law, to which no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

10. It appears that the allegations in Paragraph 10 state conclusions of law, as to which no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

11. To the extent the allegations in Paragraph 11 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

12. In response to the allegations in Paragraph 12, Epstein asserts his rights under the Fifth Amendment and declines to answer.

13. In response to the allegations in Paragraph 13, Epstein asserts his rights under the Fifth Amendment and declines to answer.

14. To the extent the allegations in Paragraph 14 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

15. To the extent the allegations in Paragraph 15 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive

pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

16. To the extent the allegations in Paragraph 16 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

17. To the extent the allegations in Paragraph 17 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

18. To the extent the allegations in Paragraph 18 concern Epstein, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

19. To the extent the allegations in Paragraph 19 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

20. To the extent the allegations in Paragraph 20 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

21. To the extent the allegations in Paragraph 21 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

22. To the extent the allegations in Paragraph 22 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

23. To the extent the allegations in Paragraph 23 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

24. To the extent the allegations in Paragraph 24 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive

pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

25. To the extent the allegations in Paragraph 25 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

26. To the extent the allegations in Paragraph 26 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer, except admits that he entered into a non-prosecution agreement with the United States Attorney's Office for the Southern District of Florida and refers to the document for its true and complete contents. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

27. To the extent the allegations in Paragraph 27 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

28. To the extent the allegations in Paragraph 28 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive

pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

29. In response to the allegations in Paragraph 29, Epstein admits that he pled guilty in Florida state court and refers to the guilty plea for its true and complete contents. Epstein otherwise asserts his rights under the Fifth Amendment and declines to answer.

30. To the extent the allegations in Paragraph 30 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

31. To the extent the allegations in Paragraph 31 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

32. To the extent the allegations in Paragraph 32 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

33. To the extent the allegations in Paragraph 33 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive

pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

34. To the extent the allegations in Paragraph 34 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

35. It appears that the allegations in Paragraph 35 are directed to an individual other than Epstein, to which no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

36. It appears that the allegations in Paragraph 36 are directed to individuals other than Epstein, to which no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

37. To the extent the allegations in Paragraph 37 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

38. To the extent the allegations in Paragraph 38 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

39. To the extent the allegations in Paragraph 39 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

40. To the extent the allegations in Paragraph 40 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

41. To the extent the allegations in Paragraph 41 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

42. To the extent the allegations in Paragraph 42 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

43. To the extent the allegations in Paragraph 43 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive

pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

44. To the extent the allegations in Paragraph 44 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

45. To the extent the allegations in Paragraph 45 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

46. To the extent the allegations in Paragraph 46 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

47. To the extent the allegations in Paragraph 47 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

48. To the extent the allegations in Paragraph 48 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

49. To the extent the allegations in Paragraph 49 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

50. To the extent the allegations in Paragraph 50 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

51. To the extent the allegations in Paragraph 51 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

52. To the extent the allegations in Paragraph 52 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive

pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

53. To the extent the allegations in Paragraph 53 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

54. To the extent the allegations in Paragraph 54 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

55. To the extent the allegations in Paragraph 55 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

56. To the extent the allegations in Paragraph 56 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

57. To the extent the allegations in Paragraph 57 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

58. To the extent the allegations in Paragraph 58 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

59. To the extent the allegations in Paragraph 59 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

60. To the extent the allegations in paragraph 60 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

61. To the extent the allegations in Paragraph 61 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive

pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

62. To the extent the allegations in Paragraph 62 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

63. To the extent the allegations in Paragraph 63 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

64. To the extent the allegations in Paragraph 64 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

65. To the extent the allegations in Paragraph 65 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

66. To the extent the allegations in Paragraph 66 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

67. In response to Paragraph 67, Epstein repeats and incorporates his responses to Paragraphs 1 through 66 of the Complaint.

68. To the extent the allegations in Paragraph 68 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

69. To the extent the allegations in Paragraph 69 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

70. To the extent the allegations in Paragraph 70 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

71. To the extent the allegations in Paragraph 71 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

72. To the extent the allegations in Paragraph 72 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

73. To the extent the allegations in Paragraph 73 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

74. It appears the allegations in Paragraph 74 state conclusion of law, as to which no response is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

75. To the extent the allegations in Paragraph 75 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

76. To the extent the allegations in Paragraph 76 concern Epstein's conduct, Epstein asserts his rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Epstein and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

77. It appears the allegations in Paragraph 77 state conclusion of law, as to which no response is required. To the extent a response is required, Epstein asserts his rights under the Fifth Amendment and declines to answer.

DEFENSES

By alleging the following defenses, Epstein does not assume any burden of proof, persuasion, or production not otherwise legally assigned to him. Epstein reserves all rights to assert other defenses as appropriate.

First Defense

The Complaint fails to state a claim upon which relief can be granted against Epstein.

Second Defense

Plaintiff's claim is barred, in whole or in part, by the applicable statute of limitations and/or laches.

Third Defense

Plaintiff failed to mitigate damages in whole or in part.

Fourth Defense

Plaintiff's claim is barred, in whole or in part, by the doctrines of assumption of risk, estoppel, unclean hands, waiver, consent and/or ratification.

Fifth Defense

Plaintiff's damages, if any, resulted from the acts or omissions of Plaintiff or third parties other than Epstein.

Sixth Defense

The damages, if any, alleged in the Complaint were directly and proximately caused, in whole or in part, by superseding or intervening conduct for which Epstein cannot be held liable.

Seventh Defense

Plaintiff's claims is barred to the extent that Plaintiff's damages, if any, did not result from any conduct for which Epstein is liable.

Eighth Defense

Plaintiff's claim is barred because Plaintiff was an educated, experienced and sophisticated individual who was free to associate and form relationships with anyone and free to terminate her association and relationships with anyone.

Ninth Defense

Plaintiff's claims are barred because Plaintiff did not actually rely and did not detrimentally and/or reasonably rely upon any misrepresentations or omissions alleged in the Complaint.

Tenth Defense

Plaintiff's claim is barred by, or the damages, if any, allegedly sustained by her are reduced by, the contributory and/or comparative fault of Plaintiff and/or third parties.

Eleventh Defense

Plaintiff's claims are barred by, or the damages, if any, allegedly sustained by her are reduced by, the contributory and/or comparative fault of Plaintiff and/or third parties.

