

IN THE CIRCUIT COURT OF THE  
FIFTEENTH JUDICIAL CIRCUIT, IN AND  
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS, individually, and  
█., individually,

Defendants.

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**UNOPPOSED EMERGENCY MOTION BY █., █., AND JANE DOE TO  
TEMPORARILY SEAL EPSTEIN'S NOTICE OF UNREDACTED MATERIALS**

Sexual assault victims █., █., and “Jane Doe” (hereinafter “the three victims”), proceeding pseudonymously and through undersigned counsel and having previously filed an unopposed motion to intervene in this action, hereby file this Unopposed Emergency Motion to Temporarily Seal Epstein’s Notice of Unredacted Materials, and in support states as follows:

As the Court is aware from previous pleadings filed in this case, on the evening Friday, March 2, 2018, counsel for Jeffery Epstein filed Epstein’s Notice of Service of Unredacted Appendix in Support of Response in Opposition to Edwards’ Second Supplement to Motion in Limine Addressing Scope of Admissible Evidence (hereinafter “Notice of Unredacted Materials”). That “Notice” included as an exhibit a series of emails over which Edwards (on behalf of his clients, █., █., and Jane Doe, the three victims who bring this motion) had asserted protections of various types. The three victims have asserted – and are continuing to assert – that these communications are privileged or otherwise protected from public disclosure.

Epstein filed that Notice of Redacted Materials in the public court file. Despite repeated requests from both Edwards' counsel and the victims' counsel, he has refused to place the materials under seal until the Court can determine whether the materials should be made public or not.

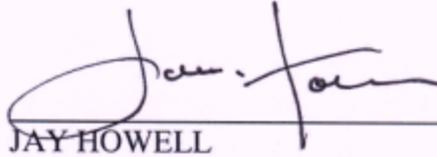
Accordingly, to protect their interests in the confidentiality of the materials, the victims move to temporarily seal the Notice of Unredacted Materials until the Court has made a determination as to whether the materials are protected or not.

The victims' motion to temporarily seal is unopposed, as both Edwards' and Epstein's counsel (previously contacted) have agreed to it.

This motion is an "emergency" motion, because the three victims seeks to seal materials which the Court will consider at the hearing the Court has scheduled for Thursday, March 8, 2018, where the confidentiality of these materials will be argued. Moreover, every minute that passes without the materials being sealed raises the possibility that the victims' confidentiality interests will be compromised.

For the foregoing reasons, the Court should grant the three victims' unopposed emergency motion to temporarily seal Epstein's Notice of Unredacted Materials.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 7<sup>th</sup> day of March, 2018.



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*Pro Hac Vice Motion Pending*

Attorneys for [REDACTED], [REDACTED], and Jane Doe

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<sup>1</sup> This daytime business address and telephone number is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah.

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