

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],

Defendants.

**PLAINTIFF'S NOTICE OF SERVICE OF RULE 45 SUBPOENA AND NOTICE OF
TAKING VIDEOTAPED DEPOSITION OF DAVID RODGERS a/k/a DAVE RODGERS**

PLEASE TAKE NOTICE THAT, pursuant to Rules 30 and 45 of the Federal Rules of Civil Procedure, counsel for Plaintiff, [REDACTED] will take a videotaped deposition as set forth below:

NAME: David Rodgers a/k/a Dave Rodgers
DATE AND TIME: November 19, 2018 at 9:00 a.m.
LOCATION: Boies Schiller Flexner, LLP
401 E. Las Olas Boulevard, Ste. 1200
Fort Lauderdale, FL 33301

The videotaped deposition will be taken upon oral examination before Magna Legal Services, or any other notary public authorized by law to take depositions. The oral examination will continue from day to day until completed.

The video operator shall be provided by Magna Legal Services. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the rules of this Court.

Plaintiff, [REDACTED] also hereby provides Notice of Service of Subpoena upon David Rodgers a/k/a Dave Rodgers. A copy of the Subpoena is attached to this Notice.

Dated: October 25, 2018.

BOIES SCHILLER FLEXNER LLP

By: /s/ Sigrid McCawley
Sigrid McCawley (*Pro Hac Vice*)
Meredith Schultz (*Pro Hac Vice*)
Boies Schiller Flexner LLP

[REDACTED]

Bradley J. Edwards, Esq. (*Pro Hac Vice*)
Stanley Pottinger, Esq.
EDWARDS POTTINGER LLC

[REDACTED]

Paul G. Cassell (*Pro Hac Vice*)
S.J. Quinney College of Law
University of Utah

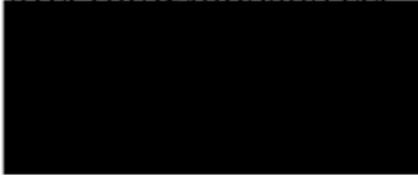
[REDACTED]

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 25th day of October, 2018, I served the attached PLAINTIFF'S NOTICE OF SERVICE OF RULE 45 SUBPOENA AND NOTICE OF TAKING VIDEOTAPED DEPOSITION OF DAVID RODGERS a/k/a DAVE RODGERS via Email to the following counsel of record.

Michael Miller
Justin Y.K Chu
Michael A. Keough
STEPTOE & JOHNSON LLP



Scott J. Link
LINK & ROCKENBACH, PA



Counsel for Jeffrey Epstein, [REDACTED] and Lesley Groff

Laura A. Menninger, Esq.
Jeffrey Pagliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.



Counsel for Ghislaine Maxwell

By: /s/ Sigrid McCawley
Sigrid McCawley