

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA-JOHNSON

JANE DOE NO. 2,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

DEFENDANT'S SECOND INTERROGATORIES TO PLAINTIFF

Defendant, Jeffrey Epstein, (hereinafter "Mr. Epstein"), pursuant to Fed.R.Civ.P. 33 and S.D. Fla. 26.1.G., submits this First Set of Interrogatories directed to Plaintiff and requests that they be answered separately, fully and under oath within thirty (30) days of service pursuant to Fed.R.Civ.P. 33 and S.D. Fla. L.R. 26.1.G. For purposes of this discovery, Definitions and Instructions are pursuant to S.D. Fla. L.R. 26.1.G.

PRELIMINARY STATEMENT

These interrogatories are deemed continuing. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure and applicable law, if any information sought by said interrogatories is not learned until after they are answered, or if any answers for any reason should later become incorrect, there shall be a continuing duty on the party answering said interrogatories to supplement or change answers previously submitted.

DEFINITIONS AND INSTRUCTIONS

1. The term "Plaintiff" refers to Jane Doe No. 2, and all her agents, employees, representatives, attorneys, accountants or anyone else acting on their behalf.

2. The term "Defendant" refers to Jeffrey Epstein and all his agents, representatives, employees, assigns, or other person or persons acting or purporting to act on its behalf.

3. The words "and" and "or" shall be construed both conjunctively and disjunctively so as to make the request inclusive rather than exclusive. The singular shall be construed to include the plural and the plural to include the singular.

4. The word "communication(s)" shall mean any oral or written statement or exchange of information of any type between two or more persons, including but not limited to documents, telephone or face-to-face conversations, meetings or conferences.

5. The word "document" shall mean any writing of every kind, including, but not limited to, any letter, book, record, report, file folder, envelope, file cabinet drawer label, memorandum, correspondence, communication, drawing, chart, draft, schedule, photograph, tape, disc, card, wire, computer program computer printout and any other electronic or mechanical recording or transcript of any other instrument or device from which information can be perceived or which is used to memorialize human thought, speech or action in the possession, custody, or control of Plaintiff. The term "document" also includes copies containing information in addition to that contained on the original and all the attachments, enclosures, or documents referred to in any document. The term "document" is also defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including, without limitation, electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term.

6. The word "person" shall mean any natural person, individual, proprietorship, partnership, corporation, association, organization, joint venture, business trust or other business enterprise, governmental body or agency, or governmental, public, legal, or business entity, or group of natural persons or other entities whether *sui juris* or otherwise.

7. The phrase "relate to" shall mean refer to, contain, allude to, respond to, comment upon, discuss, show, disclose, explain, mention, analyze, constitute, comprise, evidence, set forth, summarize, support, refute or characterize, either directly or indirectly, in whole or in part.

8. "Identify," when used to refer to a natural person, means to state the following:

- (a) his or her full name and address (or, if the present address is not know, his or her last known address);
- (b) the full name and address of each of his or her employers, each corporation of which he or she is an officer or director, and each business in which he or she is a principal;
- (c) his or her present position (or if the present position is not known, his or her last known position(s) at the time of the act to which the Interrogatory response relates).
- (d) Such other information sufficient to enable Defendant to identify the person.

9. "Identify" when used to refer to any entity other than a natural person means to state the following:

- (a) The full name of the entity, the type of the entity (e.g., corporation, partnership, etc.), the address of its principle place of business, its principle business activity, and if it is a corporation, the jurisdiction under which it has been organized and the date of incorporation.

10. "Identify," when used with reference to a Document or Communication means to state the following:

- (a) the nature of the document (e.g., letter, memorandum, etc), date of creation, author, place of preparation, the name and address of each addressee;
- (b) The identity of each signatory;
- (c) The title or heading of the document;
- (d) the general substance and subject matter;
- (e) Its present location and custodian (or, if not know, the last known);
- (f) the identity of each person to whom a copy of the document was sent and each date of its receipt and date of its transmittal or other disposition;
- (g) The circumstance of each such receipt and each transmittal or other disposition, including identity of the person transmitting and receiving it.

11. In lieu of identifying any document, Plaintiff may attach a true and correct copy of such document as an exhibit to its response to these Interrogatories, along with an explicit reference to the Interrogatory to which each document is responsive.

12. If the response to all or part of any Interrogatory is not known at the time the initial response is made, please include a statement to that effect, furnish the information that is known or available, and respond to the Interrogatory by amended or supplemental response in writing under oath within ten (10) days of the date on which the complete response becomes known or available.



3. List separately the names, addresses and phone numbers of all males, excluding Mr. Epstein, with whom you have had sexual activity since you answered the First Set of Interrogatories propounded by Defendant on or about December 10, 2008 up through the current date. Describe the nature of sexual activity, the date(s) and whether you received money or other consideration from the person.
  
  
  
  
  
  
  
  
  
  
4. Are you now, or have you ever been a member of a social networking website such as MySpace.com, Facebook.com, Bebo.com, Flickr.com or any similar websites?
  - a. If so, please list all social networking websites of which you are currently a member; list all social networking websites of which you were previously a member and state the date you joined each site and the date you cancelled your membership with each site.
  
  
  
  
  
  
  
  
  
  
  - b. Also, please list all usernames, screen names or "handles" you used for each social networking site of which you were ever a member. Also, please provide all uniform resource locators ("URL") for each social networking website of which you are, or were previously a member (i.e. myspace.com/janedoe).

5. Are you now, or have you ever been a member of an online dating website such as match.com, eharmony.com, cupid.com or any similar website?
  - a. If so, please list all online dating websites of which you are currently a member; list all online dating websites of which you were previously a member and state the date you joined each site and the date you cancelled your membership with each site.
  - b. Also, please list all usernames, screen names or "handles" you used for each online dating website of which you were ever a member. Also, please provide all URLs for each social networking website of which you are, or were previously a member (i.e. match.com/janedoe).
  
6. Do you, or have you ever kept, a diary or journal since 2002? If so, please state whether the diary or journal was/is kept in hard copy or whether it was/is kept on a computer or other electronic device.
  - a. If the diary or journal was kept in hard copy, describe its physical attributes (i.e. book, collection of loose paper, day planner) and state its current location.
  - b. If the diary or journal was/is kept on a computer or other electronic device, please identify the computer or electronic device, including the make and model; identify the owner of the computer or electronic device; and state the current location of the computer or electronic device. If the current location is unknown, please state the last known location of the computer or electronic device.

- c. Identify all individuals, including their full name, current address, home telephone number and cellular telephone number, that have read any portion of the diary or journal.
  
  - d. Please state whether any copies were made of the diary or journal. If so, state the number of copies made and identify all individuals, including their full name, current address, home telephone number and cellular telephone number, who have, or at any time had, a copy of the diary or journal.
10. Please identify all computers you have used since 2002 and identify the owner of each computer; state the make, model and current location of each computer; if the current location of a particular computer is unknown, state each location in which you used last used each computer.
11. Please identify your five closest friends for the years 2006 – 2010, including their full name, current address, home telephone number and cellular telephone number.

12. Do you intend to call at trial other females who went to Mr. Epstein's residence? If so, please identify each individual, including their name, current address, home telephone number and cellular telephone number, and identify her counsel. Also, please state the substance of each witness's testimony.

**VERIFICATION**

By: \_\_\_\_\_

STATE OF FLORIDA            )  
  ) ss  
COUNTY OF PALM BEACH    )

SWORN TO AND SUBSCRIBED before me this \_\_\_\_ day of \_\_\_\_\_, 2010 by \_\_\_\_\_, who is personally known to me or has produced the following identification \_\_\_\_\_ which is current or has been issued within the past five years and bears a serial or other identifying number.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

NOTARY PUBLIC - STATE OF FLORIDA  
Commission Number:  
My commission expires:  
(Notarial Seal)

Certificate of Service

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S.

Mail to the following addressees this 25<sup>th</sup> day of February, 2009.

Stuart S. Mermelstein, Esq.  
Adam D. Horowitz, Esq.  
Mermelstein & Horowitz, P.A.  
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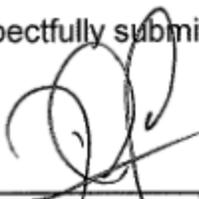
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Respectfully submitted,

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