

RDC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80232-MARRA-JOHNSON

JANE DOE NO. 3,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

_____ /

**PLAINTIFF JANE DOE 3'S ANSWERS TO
DEFENDANT'S SECOND INTERROGATORIES**

Plaintiff, JANE DOE 3, by and through their undersigned counsel, and pursuant to Federal Rules of Civil Procedure Rule 33, hereby responds to Defendant, JEFFREY EPSTEIN'S Second Set of Interrogatories to Plaintiff as follows:

General Objections

1. Plaintiff objects to Defendant's Interrogatories to the extent that the Interrogatories call for the disclosure of information protected by the attorney-client privilege, attorney work-product doctrine, or other applicable privilege or immunity, whether created by statute or common law. Plaintiff claims such privileges and protections to the extent implicated by each Interrogatory, and excludes privileged and protected information from any responses to Defendant's discovery. Any disclosure is inadvertent and is not intended to waive those privileges or protections, which are specifically reserved.

2. Plaintiff objects to Defendant's Interrogatories to the extent that same are vague, ambiguous, incomprehensible and/or overly broad.

CC-JE, DJ

Doe No. 3 v. Epstein
Page 2

3. Plaintiff objects to Defendants' Interrogatories to the extent that the Interrogatories seek to impose obligations beyond those imposed by applicable law and the applicable Rules of Civil Procedure.

4. The foregoing general objections are incorporated into each of the specific objections and responses that follow. The stating of a specific objection or response shall not be construed as a waiver of Plaintiff's general objections. Plaintiff reserves the right to supplement these responses and to make further objections. Plaintiff's responses shall neither waive nor prejudice any objections that Plaintiff may later assert.

5. Plaintiff reserves the right to supplement or amend its Responses and Objections to Defendant's Discovery as and if additional information becomes available.

6. Plaintiff objects to Defendant's interrogatories on the grounds that the total interrogatories propounded on Plaintiff by Defendant, including discrete subparts, far exceed 25, in violation of Fed.R.Civ.P 33(a)(1). By answering the interrogatories herein, Plaintiff does not waive this objection, but only provides information in the interests of cooperative discovery and to avoid a discovery dispute. To the extent that a discovery dispute arises pertaining to these answers to interrogatories, Plaintiff reserves the right to assert this objection to the entirety of Defendant's Second Interrogatories.

ANSWERS

1. List the names, business addresses, telephone and cell phone numbers, dates of employment, immediate supervisor (name and address) and rates of pay regarding all employers, including self-employment, for whom you have worked since you answered the First Set of Interrogatories propounded by Defendant on or about December 10, 2008; this includes listing any and all sources of income you have received.

Doe No. 3 v. Epstein
Page 3

ANSWER:



\$13.00/hour plus tips
July 2009-Present

2. Identify each physician or medical provider (including mental health professionals, drug or alcohol counselors and therapists) with whom you have consulted or who has treated or examined you, and identify each facility (including drug or alcohol treatment facilities, whether inpatient or outpatient) where you have received any consultation, examination or treatment that is in any way related to this case; and state as to each the date of consultation, examination or treatment and the injury, condition or other reason for which you were examined or treated since you answered the First Set of Interrogatories propounded by Defendant on or about December 10, 2008.

ANSWER:

Dr. Ryan C. Hall
2500 W. Lake Mary Blvd.
Lake Mary, FL
Examined Nov. 2009
Independent Medical Examination

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.

ANSWER:

None.

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?

Doe No. 3 v. Epstein
Page 4

- 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).

ANSWER:

Yes.

Plaintiff is currently a member of Facebook. She joined approximately 1 year ago. <http://www.facebook.com/yoli.mendez.lopez>

Plaintiff was previously a member of MySpace but cancelled her membership at approximately age 19. She does not recall her handle or URL.

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).

ANSWER:

A friend registered Jane Doe No. 3 for weathymen.com, but she has never personally used the site and does not know the username, password, or "handle" for the account. She has not been a member of any other dating websites.

Doe No. 3 v. Epstein

Page 5

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.

ANSWER:

Plaintiff kept a diary in middle school and her freshman year of high school. It has since been destroyed. It was a general composition notebook. It was never kept on a computer. To Plaintiff's knowledge, no one read any part of the journal, nor were any copies of the journal made.

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.

ANSWER:

Plaintiff objects to this request as overly broad, unduly burdensome, and not reasonably calculated to lead to admissible evidence. It is an unwarranted and baseless fishing expedition, and invasion of privacy. The apparent purpose of this request is to harass and intimidate the Plaintiff.

Doe No. 3 v. Epstein
Page 6

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.

ANSWER:

Plaintiff objects to this interrogatory as vague, overly broad, unduly burdensome, an unwarranted invasion of privacy and not reasonably calculated to lead to admissible evidence. Subject to and without waiving said objections, Plaintiff states:

1. Samantha Brennan
Royal Palm Beach, FL 33411
[REDACTED]
No home phone
2. Brittany Gutierrez
Royal Palm Beach, FL 33411
[REDACTED]
No home phone
3. Ariana Wilson
West Palm Beach, FL 33410
No cell phone
No home phone
4. Jennifer Sicilano
Atlanta, GA
[REDACTED]
No home phone

Plaintiff does not have a fifth person that she would consider "a close friend" during that time period.

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.

Answer:

Plaintiff objects to this interrogatory as vague, overly broad, unduly burdensome, cumulative, and calling for speculation. Subject to and without waiving said objections, Plaintiff states:

Doe No. 3 v. Epstein
Page 7

Plaintiff has not yet identified all of the witnesses she intends to call at trial. The witnesses who went to Epstein's residence include:

Jane Doe No. 2

Address previously provided by Mermelstein & Horowitz, P.A.,
While still a minor, Jane Doe No. 2 was brought to Defendant Epstein's home by Jane Doe No. 3 wherein she was sexually assaulted by Defendant Epstein in a manner during a massage wherein she was paid \$200.00. See transcript of Jane Doe No. 2's deposition.

Jane Doe No. 4

Address previously provided by Mermelstein & Horowitz, P.A.
While still a minor, Jane Doe No. 4 was brought to Defendant Epstein's home by [REDACTED] an agent and employee of Defendant Epstein, wherein she was repeatedly sexually assaulted during the course of a massage wherein she was paid \$200.00 for each sexual assault. Additionally, she will testify that she was generally called by Defendant Epstein's employees, [REDACTED] and [REDACTED] when Defendant Epstein wanted Jane Doe No. 4 to come to his home for sexual activity. See transcript of Jane Doe No. 4's deposition.

Jane Doe No. 5

Address previously provided by Mermelstein & Horowitz, P.A.,
As a minor, Jane Doe No. 5 went to Defendant Epstein's home as the result of a conversation with an agent of Defendant Epstein who attended school with Jane Doe No. 5. While at Defendant Epstein's home, she was sexually assaulted by Defendant Epstein during the course of a massage wherein she was paid \$200.00. See transcript of Jane Doe No. 5's deposition.

Jane Doe No. 6

Address previously provided by Mermelstein & Horowitz, P.A.
As a minor, Jane Doe No. 6 was brought to Defendant Epstein's home by E.W. to provide him with a massage. During the course of the massage, she was sexually assaulted by Defendant Epstein and was paid \$200.00. See transcript of Jane Doe No. 6's deposition.

Jane Doe No. 7

Address previously provided by Mermelstein & Horowitz, P.A.
As a minor, Jane Doe No. 7 was brought to Defendant Epstein by his employee and agent, [REDACTED] to give Defendant Epstein a massage. She was also called on the telephone by Defendant Epstein's agent and employee, [REDACTED] when Defendant Epstein wanted her to come to his home for a massage. During the course of the massages, Jane Doe No. 7 was sexually assaulted by Defendant Epstein. She was paid \$200.00 each time. See transcript of Jane Doe No. 7's deposition.

Doe No. 3 v. Epstein
Page 8

Jane Doe No. 8

Address previously provided by Mermelstein & Horowitz, P.A.

As a minor, Jane Doe No. 8 was brought to Defendant Epstein's home by C.M.A. to give Defendant Epstein a massage. During the course of the massage, Defendant Epstein sexually assaulted Jane Doe No. 8. She was paid \$200.00 for the massage/sexual assault.

S.R.

Home address unknown

c/o Brad Edwards, Esq.

Upon information and belief, Rivera was brought to Defendant Epstein's home by his employee and/or agent to give Defendant Epstein a massage wherein he sexually assaulted Rivera on at least one occasion. She will also likely testify that she knew Jane Doe No. 6 and introduced her to Courtney Wilde, who brought Jane Doe No. 6 to Defendant Epstein's home for a massage.

Jane Doe

Home address unknown

c/o Brad Edwards, Esq.

Upon information and belief, Jane Doe was invited or bought to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted Jane Doe on at least one occasion. See transcript of Jane Doe's deposition.

E.W.

Home address unknown

c/o Brad Edwards, Esq.

Upon information and belief, Wilde was brought or invited to Defendant Epstein's home by his employee and/or agent to give Defendant Epstein a massage wherein he sexually assaulted Wilde on at least on occasion. She will also likely testify that she knew Jane Doe No. 6 and brought Jane Doe No. 6 to Epstein's home at his request, and that Defendant Epstein paid her to bring other girls. See transcript of E.W.'s deposition.

L.M.

Home address unknown

c/o Brad Edwards, Esq.

Upon information and belief, L.M. was bought or invited to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted L.M. on at least one occasion. She will also likely testify that she was paid by Defendant Epstein to recruit and bring other underage girls to his home for "massages" wherein he sexually assaulted the underage girls. See transcript of L.M.'s deposition.

C.M.A.

Home Address Unknown

Doe No. 3 v. Epstein

Page 9

c/o Spencer Kuvin, Esq.

Upon information and belief, C.M.A. was bought or invited to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted C.M.A. on at least one occasion. She will also likely testify that she was paid by Defendant Epstein to recruit and bring other underage girls to his home for "massages" wherein he sexually assaulted the underage girls. See transcript of C.M.A.'s deposition.

Home address unknown

Upon information and belief, [REDACTED] was bought or invited to Defendant Epstein's home to give him a massage by his agent/employee wherein he sexually assaulted [REDACTED] on at least one occasion. She will also likely testify that she was paid by Defendant Epstein to recruit and bring other underage girls to his home for "massages" wherein he sexually assaulted the underage girls, including, but not limited to, Jane Doe Nos., 3, 4, and 7. See transcript of [REDACTED] deposition.

Jane Doe No. 101

Home Address Unknown

c/o Katherine Ezell, Esq.

Upon information and belief, Jane Doe No. 101 was invited or bought to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted Jane Doe No. 101 on at least one occasion.

Jane Doe No. 102

Home address unknown

c/o Katherine Ezell, Esq.

Upon information and belief, Jane Doe No. 102 was invited or bought to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted Jane Doe 102 on at least one occasion.

Jane Doe No. 103

c/o Katherine Ezell, Esq.

Upon information and belief, Jane Doe No. 103 was invited or bought to Defendant Epstein's by his agent/employee home to give him a massage wherein he sexually assaulted Jane Doe 103 on at least one occasion.

D.H.D.

c/o Katherine Ezell, Esq.

D.D. went with Jane Doe No. 5 to Defendant Epstein's home to give him a massage wherein she was sexually assaulted. Upon information and belief, she was also brought/invited to Defendant Epstein's home on subsequent occasions to give him a massage wherein she was sexually assaulted. D.D. will also likely testify that she was still a minor when the sexual assaults occurred.

Doe No. 3 v. Epstein

Page 10

S.E.

Home address unknown

c/o Katherine Ezell, Esq.

S.E. is likely to testify that she was brought or invited to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted her on at least one occasion. She will likely testify that she was still a minor when the sexual assault(s) occurred.

K.M.

Home address unknown

K.M. is likely to testify that she was friends with Jane Doe No. 5 and D.H.D., and knew them to have gone to Defendant Epstein's home on at least one occasion to give him a massage, and that they stated Defendant Epstein touched them in a sexual manner. K.M. is likely to testify that she too went to Defendant Epstein's home to give him a massage and during the course of that massage, Defendant Epstein touched her in sexual manner while she was still a minor.

A.H.

Home address unknown

A.H. is likely to testify that she was repeatedly sexually assaulted by Defendant Epstein at his home during the course of massages. She is also likely to testify that Defendant Epstein forced her to engage in sexual intercourse with him against her will, and that she was forced to engage in sexual activity with Epstein's employee/agent, [REDACTED], against her will. She is likely to testify that she was a minor when these events occurred.

A.D.

Home Address Unknown

A.D. is likely to testify that she was brought or invited to Defendant Epstein's home by his employee/agent to give Defendant Epstein a massage wherein she was sexually assaulted on at least one occasion. A.D. is likely to testify that she was a minor when these events occurred.

[REDACTED]
Home address unknown

L.M. is likely to testify that she was friends with Jane Doe Nos. 3, 4, and 7, and knew them to go to Defendant Epstein's home to give him massages. She is also likely to testify that she was brought or invited to Defendant Epstein's home by an agent of Defendant Epstein to give him a massage wherein she was sexually assaulted. She is likely to testify that these events occurred when she was a minor.

J.L.

Home address unknown

J.L. is likely to testify that she was friends with Jane Doe No. 3 and knew Jane Doe No. 3 to have gone to Defendant Epstein's home to give him a massage.

Doe No. 3 v. Epstein

Page 11

J.L. is also likely to testify that she was brought or invited to Defendant Epstein's home by his agent to give him a massage wherein he sexually assaulted her. She is also likely to testify that these events occurred when she was a minor.

J.S.
[REDACTED]

J.S. is likely to testify that she was friends with Jane Doe No. 3 during the relevant time period, and that she was brought to Defendant Epstein's home by [REDACTED] to give him a massage wherein he touched her in a sexual manner. She is also likely to testify that she was a minor when these events occurred.

F.E.
[REDACTED]

F.E. is likely to testify that she was friends with Jane Doe No. 7 and was brought to Defendant Epstein's house to provide him with a massage, wherein she was sexually assaulted by Defendant Epstein. She is also likely to testify that she was a minor when these events occurred.

B.B.

Address unknown
c/o Spencer Kuvin, Esq.

B.B. is likely to testify that she was brought or invited to Defendant Epstein's home by his agent or employee to give him a massage wherein she was sexually assaulted on at least one occasion. She is likely to testify that she was a minor when these events occurred.

Jane Doe II

Address unknown
c/o Sid Garcia, Esq.

Jane Doe II is likely to testify that she was brought to or invited to Defendant Epstein's home by his agent or employee to give him a massage wherein she was sexually assaulted by Defendant Epstein. She is also likely to testify that she was a minor when these events occurred.

VERIFICATION

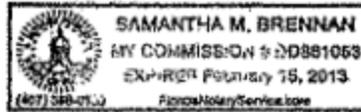
By: Yolanda A. Lopez

STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

SWORN TO AND SUBSCRIBED before me this 23 day of March, 2010 by Yolanda Lopez, 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.

Samantha M. Brennan
Print Name
Samantha M. Brennan
Signature

NOTARY PUBLIC - STATE OF FLORIDA
Commission Number: DD861053
My commission expires: Feb 15, 2013
(Notarial Seal)



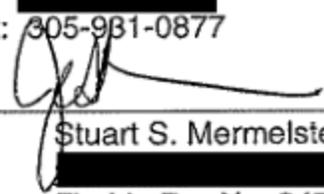
Doe No. 3 v. Epstein
Page 13

April 2, 2010

Respectfully submitted:

MERMELSTEIN & HOROWITZ P.A.
18205 Biscayne Blvd., Suite 2218
Miami, Florida 33160
www.sexabuseattorney.com

Tel: [REDACTED]
Fax: 305-981-0877

By:  _____

Stuart S. Mermelstein

[REDACTED]
Florida Bar No. 947245

Adam D. Horowitz

[REDACTED]
Florida Bar No. 376980

Jessica D. Arbour

[REDACTED]
Florida Bar No. 67885

Doe No. 3 v. Epstein
Page 14

Certificate of Service

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S. Mail and facsimile to the following addressees this 2 day of April, 2010.

Robert D. Critton, Jr, Esq.
Burman, Critton, Luttier & Coleman
303 Banyan Boulevard
Suite 400
West Palm Beach, FL 33401

Phone
Fax

Co-Counsel for Defendant Jeffrey Epstein

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012

Fax:

Co-Counsel for Defendant Jeffrey Epstein

