

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

CASE NO. 502008CA028051XXXXMB AB

█,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

---

**MOTION FOR LEAVE TO SERVE ADDITIONAL INTERROGATORIES**

Defendant, JEFFREY EPSTEIN ("Epstein"), pursuant to Fla. R. Civ. P. 1.340, moves for leave to serve additional thirty (30) interrogatories and states:

1. On February 25, 2010, Epstein propounded his Fourth Set of Interrogatories on █ (attached as **Exhibit A**).
2. With respect to interrogatories 3 – 12, █ objected and stated "beyond the limit of Interrogatories allowed pursuant to FRCP 1.340." See █ Answers to Interrogatories attached as **Exhibit B**.
3. As the Court is aware, █ is seeking significant damages in this case. In addition, █ is a witness in companion cases filed by other plaintiffs against Epstein.
4. █ testified that she went to Mr. Epstein's home anywhere from fifty (50) to more than seventy (70) times and brought more than seventy (70) females, some of whom are plaintiffs in companion cases against Epstein. See 9/24/09 Deposition Transcript of █ at 74, 164.
5. Due to the nature of the claims, the number of times █ claims to have gone to Mr. Epstein's home and the number of girls █ claims to have brought to Mr.

Epstein, permitting Epstein to serve additional interrogatories is clearly justified under the circumstances.

6. Moreover, Interrogatory Nos. 3 (past sexual history), 4 – 5 (social networking websites) of Epstein's Fourth Set of Interrogatories seeks information that the Court previously held was discoverable.

7. At the July 16, 2009 hearing on Epstein's Amended Motion to Compel, the Court ordered ■■■ to produce all information related to social networking sites. Specifically, the Court stated:

So my ruling is as follows: I am going to allow first, as dictated by Menke, the voluntary – not voluntary – but the turning over of the social-network site information that is accessible to the site owner or user, meaning the plaintiff, or plaintiffs in this case, either of them or both of them, if they have these types of networking sites, including of what would be shared with others, if those individuals allow other to become what is commonly known as friends. That will be discoverable.

See Excerpt of July 16, 2009 Transcript at 36 (attached as **Exhibit C**).

8. On August 20, 2009, the Court compelled ■■■ to answer Epstein's interrogatory related to her past sexual history. See August 20, 2009 Order attached as **Exhibit D**. ■■■ petitioned for a writ of certiorari to the Fourth District Court of Appeal regarding said order, which was denied.

9. In addition, Epstein intends to serve interrogatories relating to "common interest" or "pooled information" agreements between ■■■ and other plaintiffs, which courts have held is discoverable. See Trading Technologies Int'l v. eSpeed, Inc., 2007 WL 1302765 \* 2 (■■■. III. 2007) (noting that if a common interest agreement is memorialized in writing, the opposing party is entitled to a copy of it). Epstein also

recently served a Fifth Set of Interrogatories accompanying a Request for Admissions (attached as Composite **Exhibit E**), to which [REDACTED] objected as beyond the limit of Interrogatories allowed pursuant to FRCP 1.340. The Request for Admissions and Interrogatories seek information related to [REDACTED] CME with Epstein's expert, Dr. [REDACTED]. This information is certainly discoverable as [REDACTED] answered the Request for Admissions without objection. The Interrogatories seek explanations for [REDACTED] responses to the Request for Admissions.

10. [REDACTED] would not be prejudiced by Epstein serving additional interrogatories.

11. The allowance of additional interrogatories is in the discretion of the trial court and where there is just cause, interrogatories are generally liberally allowed. See Rich v. Hunter, 3 So. 2d 393, 396 (Fla. 1941)

WHEREFORE, Defendant, JEFFREY EPSTEIN, requests the Court enter an order granting leave to serve an additional thirty (30) interrogatories and grant any additional relief the Court deems just and proper.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S. Mail to the following addressees on this 27th day of April, 2010:

**BURMAN CRITTON LUTTIER & COLEMAN, LLP**  
303 Banyan Boulevard, Suite 400  
West Palm Beach, FL 33401

[REDACTED] Fax

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

  
Robert D. Critton, Jr.  
Florida Bar #224162  
Michael J. Pike  
Florida Bar #617296

Brad Edwards, Esq.  
Farmer, Jaffe, Weissing, Edwards,  
Fistos & Lehrman, PL  
424 N. Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301

[Redacted]  
[Redacted] - fax  
[Redacted]@ [Redacted]

*Counsel for Plaintiff*

Jay Howell, Esq.  
Jay Howell & Associates, [Redacted]  
644 Cesery Boulevard  
Suite 250  
Jacksonville, FL 32211

[Redacted] Phone  
[Redacted] Fax

*Co-counsel for Plaintiff*

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

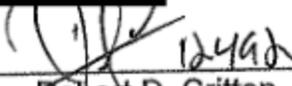
Fax: [Redacted]  
*Co-Counsel for Defendant Epstein*



[Redacted] Phone  
[Redacted] Fax  
*Co-counsel for Plaintiff*

**BURMAN, CRITTON, LUTTIER  
& COLEMAN, LLP**  
303 Banyan Boulevard, Suite 400  
West Palm Beach, FL 33401

[Redacted] Fax

By:   
Robert D. Critton, Jr.  
Florida Bar #224162  
Michael J. Pike  
Florida Bar #617296  
*(Counsel for Defendant Jeffrey Epstein)*

## DEFINITIONS AND INSTRUCTIONS

1. The term "Plaintiff" refers to ■■■, 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 known, 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 [REDACTED], [REDACTED], [REDACTED], [REDACTED] 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. [REDACTED]).

5. Are you now, or have you ever been a member of an online dating website such as [REDACTED], [REDACTED], [REDACTED] 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. [REDACTED]).

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.



**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)

4/1 2

IN THE CIRCUIT COURT OF THE 15th  
JUDICIAL CIRCUIT IN AND FOR PALM  
BEACH COUNTY, FLORIDA

CASE NO: 502008CA028051XXXXMB AB

█

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

\_\_\_\_\_ /

**NOTICE OF SERVICE OF PLAINTIFF'S UNVERIFIED ANSWERS TO  
DEFENDANT'S FOURTH INTERROGATORIES**

Plaintiff, █, hereby files her Notice of Service of Plaintiff's Unverified  
Answers to Fourth Interrogatories propounded by Defendant on <sup>February</sup> ~~March~~ 25, 2010.

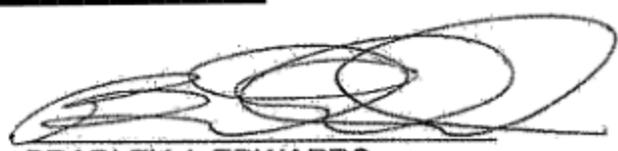
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the original of the above and a copy of the  
foregoing has been provided this 1<sup>st</sup> day of April 2010 via U.S. Mail and email  
transmittal to all those on the attached service list

Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, █.  
425 N. Andrews Ave., Suite 2  
Fort Lauderdale, FL 33301

█  
█ fax  
█

By:



BRADLEY J. EDWARDS  
Florida Bar No.: 542075

EXHIBIT B

cc: JE, DJ

**SERVICE LIST**

Robert D. Critton, Jr.  
BURMAN, CRITTON, et al.  
303 Banyan Boulevard, Suite 400  
West Palm Beach, FL 33401

Jay Howell, Esq.  
Jay Howell & Assoc.  
644 Cesery Boulevard  
Suite 250  
Jacksonville, FL 32211

Jack Alan Goldberger, Esq.  
Atterbury Goldberger et al.  
250 Australian Avenue South  
Suite 1400  
West Palm Beach, FL 33401

**PLAINTIFF'S ANSWERS TO FOURTH INTERROGATORIES**

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.

**ANSWER:**

Objection, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, harassing, without waiving objections or invocations of privilege, Plaintiff has already been deposed since December 2008 on the subject, additionally, she has withdrawn her wage claim.

2. Identify<sup>1</sup> 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:**

  
Fort Lauderdale, FL 33304

**Interrogatories 3-12**

**ANSWERS:**

Objection, beyond the limit of Interrogatories allowed pursuant to FRCP 1.340.

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

CASE NO. 502008CA028051XXXXMB AB

L.M.,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

---

CASE NO. 502008CA028058XXXXMB AB

E.W.,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

---

HEARING BEFORE THE HONORABLE  
DONALD HAFELE

Thursday, July 16 2009  
8:13 [REDACTED] - 9:10 [REDACTED].

Palm Beach County Courthouse  
West Palm Beach, Florida

Reported By:  
Pamela J. Sullivan, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting Agency, Inc.

EXHIBIT C

1 for this whatsoever, for this type of invasive  
2 discovery, where you get all access to -- whether  
3 it's voluntarily turned over or you get to go in  
4 and actually remove it from the hard drive of a  
5 computer -- the social-networking site they chose  
6 to remain private.

7 THE COURT: Well, would it have to be removed  
8 from the social network, or could it be just  
9 printed from the network?

10 MR. EDWARDS: I don't know how the network  
11 works and whether you can print every single page  
12 and what that actually does.

13 THE COURT: Well, let's find out. I mean,  
14 you know, I would have preferred Mr. Critton's  
15 amended motion to have been supplemented by an  
16 affidavit of a computer expert, to give the Court  
17 information as to how this type of  
18 social-networking information would be extracted in  
19 the least intrusive means to either plaintiff.

20 But without that, I'm in the same -- I'm in  
21 the dark myself, because I'm not a computer expert  
22 by any means.

23 MR. EDWARDS: And, Judge, just along those  
24 lines, talking about the Menke case, that was  
25 specifically a case dealing with sexually explicit

1 And, again, I'm trying my best to balance the  
2 interests between the individual's privacy rights  
3 and a defendant's right to discover what could lead  
4 to discovery of admissible evidence, when it deals  
5 with damages.

6 So my ruling is as follows: I am going to  
7 allow first, as dictated by Menke, the voluntary --  
8 not voluntary -- but the turning over of the  
9 social-network site information that is accessible  
10 to the site owner or user, meaning the plaintiff,  
11 or plaintiffs in this case, either of them or both  
12 of them, if they have these types of networking  
13 sites, inclusive of what would be shared with  
14 others, if those individuals allow others to become  
15 what is commonly known as friends. That will be  
16 discoverable. It will be placed under seal and for  
17 attorneys' eyes only at this time, pending further  
18 Court order.

19 MR. EDWARDS: Your Honor.

20 THE COURT: We'll move on now to e-mails sent  
21 and received by plaintiffs.

22 MR. CRITTON: From a time standpoint, within  
23 20 days?

24 THE COURT: Within 20 days.

25 MR. EDWARDS: And, Your Honor, my only

1 e-mails sent from his computer. And that was the  
2 computer of the perpetrator. What we're actually  
3 contemplating now is turning over all of this  
4 information, that they chose to keep private  
5 amongst their own friends, of the victims of sexual  
6 abuse to a registered sex offender.

7 THE COURT: Well --

8 MR. EDWARDS: And there is not one single  
9 thing they pointed to that is evidence that I know  
10 about -- in fact, I don't even know if they have a  
11 computer.

12 THE COURT: I wouldn't be doing this, but for  
13 the fact -- or wouldn't even be contemplating doing  
14 this, but for the fact that you have to remember a  
15 very, very important point here, respectfully, and  
16 that is your clients have brought a lawsuit against  
17 the defendant. And by doing that, there is a  
18 certain degree of discovery that must be undertaken  
19 for the defendant to defend himself against the  
20 claims that have been made based on the allegations  
21 of loss of enjoyment of life, mental anguish,  
22 damages that extend from a psychological standpoint  
23 from an alleged sexual battery. All of these  
24 things are necessary, in my view, to be able to  
25 adequately defend those claims.

1 objection to that is the Fifth Amendment privilege  
2 that would pertain to my clients and the  
3 information on there, as well as all of the other  
4 people who communicate on there and their privacy  
5 interest, as well, in addition to the fact that the  
6 Menke case says, in quotes, in the few cases we  
7 have found across the country permitting access,  
8 all have -- all have been in situations where  
9 evidence of intentional deletion of data was  
10 present. And that's not present here.

11 All of the arguments about damages claimed  
12 and a right for a defendant to defend himself could  
13 be made in every, single personal injury case that  
14 we -- that's ever existed.

15 THE COURT: I've already made my ruling, but  
16 I --

17 MR. EDWARDS: I understand.

18 THE COURT: -- as I said, I'm juxtaposing the  
19 language contained on the last page of the slip  
20 opinion, that intrusive searching of the entire  
21 computer by opposing parties should not be the  
22 first means of obtaining the relevant information.

23 And then with the last sentence: "That we do  
24 not deny the Board the right to request that the  
25 petitioner produce relevant, nonprivileged

8/20

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

CASE NO. 502008CA028051XXXXMB AB



Plaintiff,

v.

JEFFREY EPSTEIN

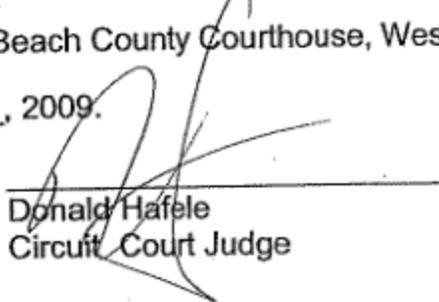
Defendant.

**ORDER ON EPSTEIN'S MOTION TO COMPEL COMPLIANCE WITH COURT ORDER  
AND FOR AWARD OF ATTORNEY'S FEES AND COSTS**

THIS CAUSE came before the Court on Epstein's Motion To Compel Compliance  
With Court Order *dated June 30, 2009* And For Award Of Attorney's Fees And Costs, and the Court having  
heard argument of counsel and being fully advised in these premises, it is hereby

ORDERED and ADJUDGED that Defendant's Motion is hereby granted ~~granted~~  
*as follows: It shall respond for the time frame from*  
*age 10 through her last encounter with the Δ, and*  
*fully as to non-consensual sexual relations for all time periods -*

DONE AND ORDERED at Palm Beach County Courthouse, West Palm Beach,  
Florida, this 20 day of Aug, 2009.

  
Donald Hafele  
Circuit Court Judge

Copies furnished:

ROBERT D. CRITTON, JR., ESQ., and MICHAEL J. PIKE, ESQ., 515 North Flagler Drive, Suite 400,  
West Palm Beach, FL 33401 and BRAD EDWARDS, ESQ., Brad Edwards and Associates, LLC. 2028  
Harrison Street, Suite 202, Hollywood, FL 33020, JAY HOWELL, ESQ., Jay Howell & Associates, ,  
644 Cesery Boulevard, Suite 250, Jacksonville, FL 32211, and JACK A. GOLDBERGER, ESQ., Atterbury  
Goldberger & Weiss, , 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401-5012

EXHIBIT D

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

CASE NO. 502008CA028051XXXMB AB

■■■■,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

\_\_\_\_\_ /

**EPSTEIN'S REQUEST FOR ADMISSIONS TO PLAINTIFF**

Defendant, JEFFREY EPSTEIN ("Epstein"), pursuant to Rule 1.370, Florida Rules of Civil Procedure, requests that Plaintiff, ■■■■, respond to the following Request for Admissions:

1. Admit that the history you gave to Dr. ■■■■ at your Compulsory Medical Examination on February 15, 2010 ("CME") was completely true and accurate.
2. Admit that you did not omit any facts from the history you gave to Dr. ■■■■ at your CME.
3. Admit that the background information you gave to Dr. ■■■■ at your CME was completely true and accurate.
4. Admit that you did not omit any facts from the background information you gave to Dr. ■■■■ at your CME.
5. Admit that you believe the questions asked of you by Dr. ■■■■ were fair and reasonable.
6. Admit that you believe the manner in which the CME was conducted with you was professional.

Composite  
EXHIBIT E



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

CASE NO. 502008CA028051XXXMB AB

█

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**EPSTEIN'S NOTICE OF SERVING  
FIFTH SET OF INTERROGATORIES TO PLAINTIFF**

Defendant, Jeffrey Epstein, files this Notice of Serving Fifth Set of Interrogatories to Plaintiff █, pursuant to Rule 1.340, Florida Rules of Civil Procedure, and requests the Plaintiff to answer said interrogatories in writing within thirty (30) days from date of service hereof.

**Certificate of Service**

I HEREBY CERTIFY that a true copy of the foregoing was sent by U.S. Mail to the following addressees on this 12<sup>th</sup> day of March, 2010:

Brad Edwards, Esq.  
Farmer, Jaffe, Weissing, Edwards, Fistos  
& Lehrman, PL  
425 N. Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301

█ - fax █  
Counsel for Plaintiff

Jack Alan Goldberger, Esq.  
Atterbury Goldberger & Weiss, █  
250 Australian Avenue South  
Suite 1400  
West Palm Beach, FL 33401-5012  
Fax: █  
Co-Counsel for Defendant Jeffrey Epstein

Jay Howell, Esq.  
Jay Howell & Associates, █  
644 Cesery Boulevard  
Suite 250  
Jacksonville, FL 32211  
█ Phone

[Redacted] Fax  
Co-counsel for Plaintiff

**BURMAN, CRITTON, LUTTIER  
& COLEMAN, LLP**  
303 Banyan Boulevard, Suite 400  
West Palm Beach, FL 33401

[Redacted] Fax

By:  12492

Robert D. Critton, Jr.  
Florida Bar #224162  
Michael J. Pike  
Florida Bar #617296  
(Counsel for Defendant Jeffrey Epstein)

### FIFTH SET OF INTERROGATORIES

1. If your response to Request for Admissions No. 1<sup>1</sup> was anything other than an admission, please explain why you did not admit that the history you gave to Dr. [REDACTED] [REDACTED] at your Compulsory Medical Examination on February 15, 2010 ("CME") was completely true and accurate and describe any false or inaccurate statements given to Dr. [REDACTED].
  
2. If your response to Request for Admissions No. 2 was anything other than an admission, please describe the facts or events you omitted from the history given to Dr. [REDACTED].
  
3. If your response to Request for Admissions No. 3 was anything other than an admission, please explain why you did not admit that the background information you gave to Dr. [REDACTED] [REDACTED] at your CME was completely true and accurate and describe any false or inaccurate statements given to Dr. [REDACTED].

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<sup>1</sup> All of the interrogatories relate to the Request for Admissions served by Defendant on March 12th, 2010.



7. If your response to Request for Admissions No. 7 was anything other than an admission, please explain why you believe you were not treated respectfully or fairly at your CME.
  
8. If your response to Request for Admissions No. 8 was anything other than an admission, please explain why you believe the testing procedures at your CME were not fair or reasonable.

**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)