

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CIVIL DIVISION

BRADLEY J. EDWARDS, and
PAUL G. CASSELL,

CASE NO. CACE 15-000072

Plaintiffs,

v.

ALAN DERSHOWITZ,

Defendant.

MOTION TO QUASH OR FOR PROTECTIVE ORDER
REGARDING SUBPOENA SERVED ON NON-PARTY LAW FIRM
BOIES, SCHILLER & FLEXNER LLP

Non-party law firm Boies Schiller & Flexner LLP (“BSF”), by and through undersigned counsel and pursuant to Florida Rules of Civil Procedure 1.410(c)(1), hereby moves for an order quashing the subpoena *duces tecum* served on BSF by Defendant; or alternatively, pursuant to Florida Rules of Civil Procedure 1.280(c) for issuance of a protective order sharply limiting the scope of the subpoena.

INTRODUCTION

This Court should quash the subpoena issued to non-party law firm BSF as it is unreasonable and oppressive for the following reasons: (1) Defendant seeks entirely privileged documents from a non-party law firm of communications with a non-party client that are not subject to production; (2) Defendant’s subpoena is duplicative of the subpoena Defendant served on this non-party law firm’s client, Jane Doe No. 3, and is meant only to cause undue burden to this law firm in forcing a response; and (3) Defendant is abusing the subpoena power by serving

subpoenas in this action that are irrelevant and, instead, intended as backdoor discovery for other actions.

Defendant has publicly attacked BSF's client, Jane Doe No. 3, who was a victim of sexual trafficking, for attempting to join in a Crime Victim's Rights Act ("CVRA") case pending in federal court in the Southern District of Florida. Defendant has made very clear that he will attack anyone who dares to defend Jane Doe No. 3. Defendant has gone so far as to pledge he will find a way to send this victim of sexual trafficking to "jail" for attempting to assert her rights. Defendant stated, "The end result of this case should be she [*Jane Doe No. 3*] should go to jail, the lawyers should be disbarred ...". (emphasis added). See Exhibit 1, CNN International, New Day, January 6, 2015. "*My goal is to bring charges against the client and require her to speak in court.*" (emphasis added). See Exhibit 2, Australian Broadcasting System (ABC), January 6, 2015. Defendant also stated: "[Jane Doe No. 3] was hiding in Colorado...but we found her and she will have to be deposed...The end result is that she'll go to jail because she will repeat her lies and we'll be able to prove it and she will end up in prison for perjury." See Exhibit 3, New York Daily News, April 7, 2015.

Defendant also admits publicly that he is seeking the deposition of non-party Jane Doe No. 3 in this case because he hopes to bring a new lawsuit against her: "*And we're considering suing her for defamation...we found her, we served her and now she'll be subjected to a deposition.*" (emphasis added). See Exhibit 4, NewsMax, April 8, 2015. These public statements make it clear that Defendant is abusing the subpoena power of this Court to try to get discovery that is irrelevant to this case in the hopes of generating a claim against Jane Doe No. 3. To that end, Defendant has wrongfully served a subpoena on a law firm.

ARGUMENT

1. This Court Should Quash Defendant's Abusive Subpoena In Its Entirety.

Florida Rule of Civil Procedure 1.410(c)(1) provides that the Court may “quash or modify the subpoena if it is unreasonable and oppressive.” *Id.* The Court has discretion to evaluate the circumstances in determining whether the subpoena is “unreasonable and oppressive.” *Matthews v. Kant*, 427 So. 2d 369, 370 (Fla. 2d DCA 1983). “The sufficiency thereof is a factual determination for the trial judge who is vested with broad judicial discretion in the matter, and whose order will not be overturned absent a clear showing of abuse of discretion.” *Id.*; *see also Sunrise Shopping Center, Inc. v. Allied Stores Corp.*, 270 So. 2d 32 (Fla. 4th DCA 1972) (Fourth DCA quashing lengthy subpoena served on non-party who was not in control of documents as being “oppressive and unreasonable.”)¹ The documents requested in Defendant’s subpoena demonstrate the oppressive and unreasonable nature of the requests. *See* Exhibit 5, Affidavit of Attorney Sigrid McCawley.

a. A Non-Party Law Firm’s Communications And Exchanges With Its Non-Party Client Are Not Subject To Production.

The communications between BSF and its client were in the course of rendering legal advice and are privileged. Florida courts are unequivocal in stating that an opposing party can never obtain attorney-client privileged materials. *See Quarles & Brady LLP v. Birdsall*, 802 So. 2d 1205, 1206 (Fla. 2d DCA 2002) (quashing discovery order and noting “undue hardship is not

¹ In addition to its power to quash the subpoena, Florida Rule of Civil Procedure 1.280(c) also allows the Court to protect a non-party from discovery that would result in “annoyance, embarrassment, oppression or undue burden or expense...” *Allstate Ins. Co. v. Langston*, 655 So. 2d 91, 94 (Fla. 2003) (Florida Supreme Court overturning denial of protective order and holding that “[d]iscovery of certain kinds of information ‘may reasonably cause material injury of an irreparable nature.’”) (internal quotations omitted). The Court may determine that “the discovery not be had” or that “the discovery may be had only on specified terms and conditions...” Fla. R. Civ. P. 1.280(c).

an exception (to disclosure of privileged material), nor is disclosure permitted because the opposing party claims that the privileged information is necessary to prove their case” (internal citations omitted). Not surprisingly, Florida law does not allow a party to take a foray into the playbook of its opponent, let alone a non-party, during an ongoing litigation, and courts routinely quash subpoenas seeking the categories of documents at issue here. *See Federal Exp. Corp. v. Cantway*, 778 So. 2d 1052 (Fla. 4th DCA 2001) (quashing trial court order compelling discovery of documents subject to work product protection.). There is a reason why Florida courts do not condone this type of discovery tactic, as it would eviscerate the ability of a party and her attorneys to prepare their case. *See, e.g., Publix Super Markets, Inc. v. Anderson*, 92 So. 3d 922 (Fla. 4th DCA 2012) (quashing order compelling discovery of document and materials prepared in anticipation of litigation).

In addition to the privilege protection, the law also clearly protects non-parties from having to disclose confidential information. *See Westco, Inc. v. Scott Lewis' Gardening & Trimming, Inc.*, 26 So. 3d 620, 622 (Fla. 4th DCA 2010) (court explaining that “[w]hen confidential information is sought from a non-party, the trial court must determine whether the requesting party establishes a need for the information that outweighs the privacy rights of the non-party.”). The communications and exchanges that BSF has with its client, non-party Jane Doe No. 3, are confidential in nature. Defendant’s requests attempt to invade the privilege and confidential nature of these communications. For example, Request no. 23 seeks “All documents which are related to when Jane Doe No. 3 allegedly told her attorneys that Alan Dershowitz was among the men she had sexual relations with.” Defendant has not established any basis to justify disclosure of privileged and confidential information from this non-party.

Moreover, even if BSF had documents which were not privileged, it is not at liberty to

produce those documents because they are the property of its client, Jane Doe No. 3. *See Sunrise Shopping Center, Inc. v. Allied Stores Corp.*, 270 So. 2d 32 (Fla. 4th DCA 1972) (quashing subpoena served on non-party who was not custodian of the documents sought). For example, Request no. 16 directs BSF to produce non-party Jane Doe No. 3's personal diary. In *Davidson v. GEICO*, Case No. 8:09-CV-727-T-33MAP, 2010 WL 4342084, at *5 (M.D. Fla. Oct. 26, 2010), GEICO served a subpoena on two non-party law firms, rather than the client/party, in an effort to obtain documents. The District Court quashed the subpoenas for the law firm's records finding among other things that the requests were overly broad and included requests for documents irrelevant to the claims at issue in the underlying action. *Id.* at *5. The Court held it would not require the law firms to "sift through" their client files especially considering that the party had not established it was unable to obtain similar discovery through other means. *Id.* Similarly here, this non-party law firm should not be placed under undue burden by having to respond to discovery relating to a non-party client.

b. Defendant's Subpoena On BSF Is Duplicative Of Its Subpoena On Non-Party Jane Doe No. 3 And Is Meant Only To Cause Undue Burden.

Defendant's subpoena is unreasonable and oppressive in that it contains twenty three (23) separate requests which include sub-parts served on this non-party. Not only is the subpoena lengthy, but it is duplicative of the subpoena this Defendant served on BSF's client, non-party Jane Doe No. 3.² *See* Exhibits 6 and 7, Defendant's Subpoena to BSF and Jane Doe No. 3; and

² BSF Request no. 1 is duplicative of Jane Doe Request no. 17; BSF Request no. 2 is duplicative of Jane Doe Request no. 18; BSF Request no. 3 is duplicative of Jane Doe Request no. 1; BSF Request no. 4 is duplicative of Jane Doe Request no. 2; BSF Request no. 5 is duplicative of Jane Doe Request no. 3; BSF Request no. 6 is duplicative of Jane Doe Request no. 5; BSF Request no. 7 is duplicative of Jane Doe Request no. 6; BSF Request no. 8 is duplicative of Jane Doe Request no. 7; BSF Request no. 9 is duplicative of Jane Doe Request no. 8; BSF Request no. 10 is duplicative of Jane Doe Request no. 9; BSF Request no. 11 is duplicative of Jane Doe Request no. 11; BSF Request no. 12 is duplicative of Jane Doe Request no. 12; BSF Request no. 13 is

Exhibit 8, Non-Party BSF's Objections to Defendant's Subpoena *Duces Tecum* respectfully.

Moreover, the duplicative subpoena is clearly a fishing expedition into a law firm's files in the hopes of generating a claim against a law firm's non-party client. In *Sugarmill Woods Civic Assoc., Inc. v. Southern States Utilities*, 687 So. 2d 1346, 1350-51 (Fla. 1st DCA 1997) the First District affirmed the trial court's order quashing a subpoena served on a lawyer and staff, under its discretionary authority, noting the subpoena to counsel was intended as a harassing fishing expedition which should not be condoned by the Court. Like the *Sugarmill* case, Defendant's subpoena on this non-party law firm should be quashed in its entirety as a harassing fishing expedition.

c. Defendant Is Abusing The Subpoena's Power By Seeking Information Irrelevant To This Case For Personal Gain.

Defendant's subpoena should be quashed because it seeks information that is irrelevant to the underlying action. See *Calvo v. Calvo*, 489 So. 2d 833, 834 (Fla. 3d DCA 1986) (court quashing subpoena served on wife's bank for financial records finding them irrelevant: "indeed, the husband has failed to demonstrate what possible relevance the records might have in the proceeding below other than to harass the wife."). The face of the requests themselves demonstrate that Defendant is abusing the subpoena power of this Court to seek documents that are not relevant to the Florida Defamation Action, which deals with the discrete issue of whether Defendant made publicly defaming statements about the character of lawyers Paul Cassell, a

duplicative of Jane Doe Request no. 13; BSF Request no. 14 is duplicative of Jane Doe Request no. 14; BSF Request No. 15 is duplicative of Jane Doe Request No. 15; BSF Request no. 16 is duplicative of Jane Doe Request no. 16; BSF Request no. 17 is duplicative of Jane Doe Request no. 19; BSF Request no. 18 is duplicative of Jane Doe Request no. 21; BSF Request no. 19 is duplicative of Jane Doe Request no. 22; BSF Request no. 20 is duplicative of Jane Doe Request no. 23; BSF Request no. 21 is duplicative of Jane Doe Request no. 24; and BSF Request no. 22 is duplicative of Jane Doe Request no. 25. The only Request that is not duplicative is Request no. 23.

retired federal judge and his colleague, Brad Edwards. Instead, Defendant's subpoena cites repeatedly to allegations in the CVRA case pending in the Southern District of Florida.

In *Toledo v. Publix Super Markets, Inc.*, 30 So. 3d 712 (Fla. 4th DCA 2010), the Fourth District Court of Appeal quashed the trial court's discovery order where party sought a law firm client file relating to a different matter. The court explained the discovery related to a different case and that a party's "curiosity" about a law firm's records does not satisfy the relevance requirement. *Id.* at 714. In quashing the order, the Fourth District Court of Appeal found that the content of the "subpoena is a classic 'fishing expedition' and the trial court's order departs from the essential requirements of the law." *Id.* Like the *Toledo* case, here, Defendant has wrongfully served a subpoena on a law firm seeking information that is not relevant to the underlying action. For example, Request nos. 2, 3, 5, 6, 7, 10, 14, 17, 19, and 20 specifically reference either the federal action by name, or Jeffrey Epstein, the subject of the federal action.

Defendant also abuses the Court's subpoena power by seeking documents wholly unrelated to the Florida Defamation Action in an effort to drum up a claim against non-party Jane Doe No. 3 for Defendant's publicly-stated purpose of finding a way to send her to "jail." *See Allstate Ins. Co. v. Langston*, 655 So. 2d 91, 94 (Fla. 2003) (Florida Supreme Court holding that "we do not believe a litigant is entitled carte blanche to irrelevant discovery" and "[i]t is axiomatic that information sought in discovery must relate to the issues involved in the litigation, as framed in the pleadings.") (internal citations omitted). Defendant's wrongful motive of developing claims against Jane Doe No. 3 is clear from the face of the Requests. In addition, the Requests are objectionable because they seek highly personal and confidential information. *See Westco, Inc. v. Scott Lewis' Gardening & Trimming, Inc.*, 26 So. 3d 620, 622 (Fla. 4th DCA 2010) (court explaining that "[w]hen confidential information is sought from a non-party, the

trial court must determine whether the requesting party establishes a need for the information that outweighs the privacy rights of the non-party.”) .

Defendant’s subpoena requests include, for example, asking this non-party law firm to produce highly personal and sensitive information from a victim of sexual trafficking, including requesting her personal diary during the time when she was being sexually abused as a minor child and writings related to her experience. *See* Exhibit 6, Request nos. 1, 8, 9, 10, 11, 13, 16, 19 and 20. Defendant also demands that this law firm produce photographs and videos of Jane Doe No. 3, as a minor child, while she was being sexually trafficked by convicted sex offender, Jeffrey Epstein. *See* Exhibit 6, Request nos. 4, 5, 11 and 13. Defendant also demands that the law firm produce information relating to its client’s personal financial information. *See* Exhibit 6, Request nos. 2 and 18; *see also Woodward v. Berkery*, 714 So. 2d 1027, 1035-38 (Fla. 4th DCA 1998) (quashing lower court’s discovery order and finding irreparable harm to husband in disclosure of private financial information when wife’s clear purpose was to wrongfully disclose the financial information to the press). It is without question that Defendant is abusing the subpoena power in this case to conduct a fishing expedition in an effort to intimidate and harass this victim. Defendant has established no need for these highly irrelevant and confidential personal documents and any alleged need would be outweighed by the non-party’s privacy rights in this instance. Accordingly, Defendant’s subpoena to BSF should be quashed.

CONCLUSION

WHEREFORE, non-party law firm, Boies, Schiller and Flexner LLP, respectfully requests that this Court grant its Motion to Quash the subpoena served on the law firm which is duplicative of the subpoena served on its client, Jane Doe No. 3; or alternatively, that the Court

enter an order limiting the scope of BSF's document production. BSF also respectfully requests an award of fees and costs relating to the subpoena.

Dated: April 9, 2015

Respectfully submitted,

BOIES, SCHILLER & FLEXNER LLP

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By: /s/Sigrid S. McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Electronic Mail on April 9, 2015 to the individuals identified on the attached Service List.

By: /s/Sigrid S. McCawley
Sigrid S. McCawley

SERVICE LIST

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EXHIBIT 1

CNN

SHOW: New Day 8:30 AM EST

January 6, 2015 Tuesday

TRANSCRIPT: 010606CN.V42

SECTION: NEWS; International

LENGTH: 3114 words

HEADLINE: Plan Crash Survivor's Steps; Celebrities Fight Sex Scandals; Remembering Mario Cuomo

BYLINE: Alisyn Camerota, Martin Savidge, John Berman, Michaela Pereira, Paul Callan, Chris Cuomo, Ana Cabrera

GUESTS: Wendy Murphy

HIGHLIGHT:

Friday night, seven-year-old Sailor Gutzler freed herself from the upside down wreckage of her family's plane, moving past the bodies of her mother, father, sister and cousin, and walked nearly a mile to Larry Wilkins' home in remote western Kentucky to get help. There are new developments in the sex scandal involving Prince Andrew and famed attorney **Alan Dershowitz**, including the fact that Dershowitz has counter sued [REDACTED]. Chris Cuomo, the son of the former governor of New York Mario Cuomo, reflects on his father's legacy as a politician and family man.

BODY:

JOHN BERMAN: All right, 32 minutes after the hour.

Buckingham Palace took the rare step to speak out about the sex abuse accusations against Prince Andrew, but is talking about it really the best strategy? How to handle ugly accusations, next.

CAMEROTA: New developments in the sex scandal involving Prince Andrew and famed attorney **Alan Dershowitz**. Moments ago we learned that **Alan Dershowitz** has counter sued [REDACTED], that's the woman who says that the lawyer sexually abused her when she was a teenager. Dershowitz is demanding his name be removed from her lawsuit and is asking for damages. Roberts says that a wealthy investor forced her into sex slavery when she was a teenager to please his powerful friends, including Dershowitz and Prince Andrew. The accuser now says she is being re-victimized. All of this raising big questions of how public figures should fight back against ugly accusations.

Let's bring in Paul Callan. He's a CNN legal analyst, criminal defense attorney and former prosecutor to talk about all this, also former prosecutor Wendy Murphy will join. She's an adjunct professor of sexual violence at New England Law in Boston.

Great to see both of you.

OK, let's start with the news this morning. Paul, **Alan Dershowitz**, hours ago, has filed this countersuit in Florida because he feels he's being defamed by this lawsuit by this woman, [REDACTED]. CNN is naming her because she has gone public with her name. So is that the best way for celebrities and high-profile people to handle allegations like this?

PAUL CALLAN, CNN LEGAL ANALYST: Well, **Alan Dershowitz** has done something you never see done in these cases. He's gone nuclear. I mean, he's going apoplectic. He's threatening to sue Roberts and he's starting his own lawsuit. Usually you try to make the whole thing go away so it's forgotten.

There's a complexity to this lawsuit because the allegations against Dershowitz, that he slept with this 15-year-old, and, incidentally, Prince Andrew as well, were included in court documents related to another lawsuit. And normally, anything you say in a court document relating to a pending lawsuit is, there's immunity. You can't sue somebody for saying that. So Dershowitz was baiting Roberts saying, why don't you say it publicly and I'm going to sue you because it's a lie. But apparently he must have stumbled on some theory that would give him grounds to sue around this court immunity doctrine. So it will be interesting to see it today.

CAMEROTA: Yes. Wendy, we have an example of **Alan Dershowitz** being so angry and so vociferous in denying these charges yesterday on NEW DAY. Watch this.

(BEGIN VIDEO CLIP)

ALAN DERSHOWITZ, ATTORNEY: I will take action. I am filing today a sworn affidavit denying categorically the truth. I'm seeking to intervene in the case. I am challenging her to file rape charges against me. I waive any statute of limitations, any immunity, because if she files a false rape charge against me, she goes to jail. The end result of this case should be she should go to jail, the lawyers should be disbarred and everybody should understand that I am completely and totally innocent.

(END VIDEO CLIP)

CAMEROTA: Wendy, what do you think about his strategy? Because there's one school of thought that says you never even dignify the allegations with a response.

WENDY MURPHY, FORMER PROSECUTOR: Yes, I mean the problem is he is almost in a protest too much state of mind for me. You know, I think the way the prince is handling it is, in a sense, more credible because it's more restrained in that exact way, Alisyn, we don't dignify these kinds of things. Of course it's silly. Of course it's not true.

You know, the problem with **Alan Dershowitz's** position is, he doesn't really know all of the evidence that they have. I mean what if this woman has, you know, intimate knowledge of things about his body parts, for example, that will be unassailable proof that, in fact, she did have access to his body. The kind of thing that no matter how much he yells and screams, he won't be able to rebut. That could be some pretty explosive proof against him.

CAMEROTA: It could be but --

MURPHY: I'm glad he did it.

CAMEROTA: Yes, I mean, you have to - MURPHY: Go ahead.

CAMEROTA: You have to assume that because he's make so vocal and so public a response that he believes that there's nothing like that out there.

Wendy, let me just stop you for a second -

MURPHY: Yes.

CAMEROTA: Because I want to tell you the victim in - the alleged victim in this case, [REDACTED], has now responded to CNN and **Alan Dershowitz** for calling her a liar. Let me tell you what she says. "It appears I am now being unjustly victimized again. These types of aggressive attacks on me are exactly the reason why sexual abuse victims typically remain silent and the reason why I did for a long time. That trend should change. I'm not going to be bullied into silence."

Wendy, your thoughts on her response?

MURPHY: Yes, I -- you know, it is a reason, in my work, you know, in decades of this work, it is something victims talk about a lot. I'm not going to speak out, especially against a wealthy, powerful, and influential person because they will have the ability to sue me falsely. That's the fear that a lot of real victims have.

Look, if **Alan Dershowitz** wants to use the legal system to demonstrate his innocence, he has the right to do that. The problem is, now that he's filed a public claim, the airing of all the details will come out, and what's he going to do if there is some kind of unassailable evidence against him? I mean he said, for example, he's only been at Jeffrey Epstein's house once and it was with his wife and children. What if it comes out that he was actually there, and there are photographs of him there on another occasion?

CALLAN: Well, you have to - you know, but, Wendy, I think you have to assume, Dershowitz can't be that stupid. I mean he taught at Harvard for long enough that I assume that basic facts like that he's going to be certain on. And if Dershowitz is in fact innocent of this charge, then he's not worried about body parts or locations where sex took place if no sex did take place.

CAMEROTA: Dershowitz also called for [REDACTED]' attorneys to be disbarred. He believes they should never have taken this case. Let me quickly read to you their statement in response to **Alan Dershowitz**. "Out of respect for the courts desire to keep this case from being litigated in the press, we are not going to respond at this time to specific claims of indignation by anyone. Nevertheless, we would be pleased to consider any sworn testimony and documentary evidence Mr. Dershowitz would like to provide which he contends would refute any of our allegations."

Paul Callan, Wendy Murphy -

MURPHY: Yes. CAMEROTA: We have to leave it there. We're running out of time. But,

obviously, this case is not going away with **Alan Dershowitz's** new legal action this morning. We'll take it up again. Thanks so much for being here.

We'd love to know what you think about all this. You can tweet us @newday on the best way to handle allegations like this.

Let's go over to John.

BERMAN: All right, thanks, Alisyn.

An American giant is gone, but his legacy lives on. Our friend and colleague, Chris Cuomo, remembers his father, former New York Governor Mario Cuomo. A touching tribute that you do not want to miss, it's coming up next.

PEREIRA: So, the funeral for former New York governor Mario Cuomo gets under way in just over two hours right here in New York City. Dignitaries including Bill and Hillary Clinton, Attorney General Eric Holder are expected to pay their respects. You know, Chris mentioned to us, our NEW DAY family, that his father's life has served as a lesson for him since he was a very little boy, but that even now his pop is, as he called him, is still teaching him a lesson about what endures.

(BEGIN VIDEOTAPE)

MARIO CUOMO, FORMER GOVERNOR OF NEW YORK: When it's over, I want people to say, now, there was an honest person.

CHRIS CUOMO, CNN ANCHOR (voice-over): Pop's body is gone. I know because I counted out his pulse until his heart fell silent, 5:15 p.m. His two favorite numbers, 5 and 15. So now his baggy, brown eyes, solid grip of soft, thick fingers, oaken body, they're all gone. But what was most important about my father and to him has passed on.

Passed on as in still exists, just in a different way. His spirit passed on to his creator, the spirit of his message endures in us. Timeless and timely, a call to remember that if all do not share in America's success, there is no real success.

M. CUOMO: We can make it all the way with the whole family intact, and we have more than once, wagon train after wagon train, to new frontiers of education, housing, peace, the whole family aboard, constantly reaching out to extend and enlarge that family, all those struggling to claim some small share of America.

C. CUOMO: Our interconnectedness, our diversity as America's true strength. The value found in immigrants like our family desperate to work, to be part of the dream.

M. CUOMO: Thank you very much.

C. CUOMO: Two speeches in eight weeks would define his political life for many of you, the keynote in 1984.

UNIDENTIFIED MALE: Ronald Reagan rode into the '80s on a political white horse.

C.CUOMO: When he took on Ronald Reagan's shining city.

M. CUOMO: There are people who sleep in the city's streets, in the gutter, where the glitter doesn't show.

C. CUOMO: And his talk at Notre Dame, where he took on his church's notion of a Catholic politician.

M. CUOMO: We know that the price of seeking to force our belief on others is that they might someday force their belief on us. I protect my right to be a Catholic by preserving your right to be anything else you choose.

C. CUOMO: The man liked a challenge. Both relied on his core belief, we are here to help as many as we can in the best way we can, and that means protecting freedom, especially freedom from oppression. You will hear him called Hamlet on the Hudson. Question it. It's a media phrase more than a matter of fact. Pop did not think he should run for president.

M. CUOMO: Has nothing to do with my chances. It has everything to do with my job as governor, and I don't see that I can do both. Therefore, I will not pursue the presidency.

C. CUOMO: Many could not, or would not, accept that and tried publicly and privately to push him to do otherwise. For better or worse, that's what separated my father from other politicians. He, in fact, did not vacillate, and until the day he died, I never heard him regret the decision, period. But that is merely politics, which can't be forgotten quickly enough. What really matters has certainly been passed on to me, and my siblings, and our kids and that was pop's love, like a big bear hug on your heart kind of love. His unique sense of humor could be a weapon and a salve.

M. CUOMO: Christopher, you have - -

(LAUGHTER)

M. CUOMO: Let me tell you, Christopher. You have found so many unusual ways to heap new expenses on this family. You really have. I mean, and you've done it not after, you know, a sweating effort, he's done it naturally.

C. CUOMO: Who to be, how to be, from the simple, a handshake is firm, a tie is tied in a Windsor knot, a man shines his own shoes and does so often. He carries a hanky, one for others, one for himself. He wears a hat, not a cap, unless it's a cheese cutter. He always has cash and does not go Dutch. Pass first, shoot second. Play hard, and then play harder. From that to the sublime, all that matters in life is devotion to something bigger than yourself, family, the less fortunate, take up for them always. His passion for purpose, love recklessly, fight the good fight fiercely, outwork everyone. M. CUOMO: One of the simple things I wanted to achieve is I want to be governor, I want to be the hardest working there ever was.

C. CUOMO: Compete hard or not at all.

M. CUOMO: So far, you know, we haven't lost all year.

C. CUOMO: And never as a function of the chance of success.

M. CUOMO: This is our first game.

C. CUOMO: And for all the requirements on an individual, the most important was a command for the collective. Collaborate in making this world a better place.

M. CUOMO: What is our mission in this place? Your job is to make it as good as you can make it. That's all there is. There is no other significance.

C. CUOMO: None of that could ever be buried. Living on in the hearts, and minds, and actions of those who bear his name, who heeded his call to action then and now, that all will pass on. The man himself is gone. The father I went to in times of distress is not there. The truth hurts, pop would say, and this truth hurts worse than I imagined. But I also know what pop would tell me to do. Wipe my face, let my kids see that I love them, be there for my family, and do the right thing. And I will, pop, just like you.

M. CUOMO: Just keep going forward believing ever more deeply that it's right to give to people and to the world.

(END VIDEOTAPE)

PEREIRA: What a powerful tribute to his dad.

BERMAN: Like a big bear hug, I think, on all of our hearts as Chris would say so nicely in that piece.

CAMEROTA: And we got to know Mario Cuomo so much better through Chris' eyes. That was a real gift.

BERMAN: And we got to see, you know, take the stuffing out of Chris, too, sitting there as a young boy. It was amazing.

PEREIRA: But, you know, he loves in the very same way that his dad did. Have you noticed that?

CAMEROTA: Yes.

BERMAN: Big, big.

CAMEROTA: Beautiful. We'll be right back.

CAMEROTA: As you all know, Chris Cuomo loves telling the stories of people who are making an impact. So here's on such story. Former NFL player Ricardo Silva went from studying playbooks to textbooks. Today he's a high school math teacher motivating his students to impact your world. Here's Chris Cuomo.

(BEGIN VIDEOTAPE)

RICARDO SILVA, FORMER NFL PLAYER: You have four minutes, four minutes until competition.

C. CUOMO: Ricardo Silva is using his competitive edge to make math count for these high school students in Washington, D.C.

SILVA: Number three is what? My hope is to bring awareness to the students. Not just geometry, but total life outcomes. You can do whatever you want through education.

C. CUOMO: Silva's first job wasn't in a classroom, it was on a football field playing for the Detroit Lions.

SILVA: My mission was to get to college and start in the NFL. Now that's moved on to something more meaningful to me, which is providing opportunities to kids that do not necessarily know how to get where they need to be.

C. CUOMO: Helping Silva do just that is Teach for America. The program offers free classroom training to college graduates and professionals from various backgrounds. In exchange they teach in an underserved school for two years.

SILVA: Kids that have low socioeconomic status are, you know, not achieving as well as their more affluent counterparts, and we're trying to close the educational achievement gap. This is why I'm here.

C. CUOMO: It's certainly not for the paycheck or the ease of the job.

SILVA: Football, all you have to do is wake up every day, work out and do what the coaches tell you to do. In school you have to motivate young teenagers who are more interested in their social media outlets than math.

C. CUOMO: A seemingly impossible task, but Silva is up for the challenge.

SILVA: What's the first thing that we must do?

All I had was one person believing in me my entire life, which was my mom, and I feel like I can bring that to the kids.

Way to go, (INAUDIBLE).

All they need was one person telling them that they can do it and they can be successful.

(END VIDEOTAPE)

PEREIRA: And he's that one person.

BERMAN: Man, motivating kids tougher than any NFL linebacker, that's for sure.

CAMEROTA: Yes, right. So, for more on how you can help, go to CNN.com/impact.

BERMAN: All right, it is time now for "NEWSROOM" with Ana Cabrera who is in today for Carol Costello.

Ana, take it away.

ANA CABRERA, CNN ANCHOR: Good morning guys, and I haven't even said happy new year to you yet, so happy new year.

CAMEROTA: You, too.

EXHIBIT 2

SHOW: AUSTRALIAN BROADCASTING SYSTEM (ABC) 7.30 8:05 PM AEST ABC

January 6, 2015 Tuesday

LENGTH: 942 words

HEADLINE: Prince Andrew under pressure as Palace disputes teen sex scandal claims

REPORTERS: Philip Williams

BODY:

LEIGH SALES, PRESENTER: It's been a few years since Britain's Royal Family has been embroiled in a serious scandal, but once again, Prince Andrew has stepped forward.

He's accused of having sex with an underage girl in sensational details aired in an American court case.

The young woman says she was forced to entertain the Duke at the behest of his friend, billionaire and convicted paedophile Jeffrey Epstein.

Prince Andrew's ex-wife, Sarah Ferguson, has leapt to his defence and Buckingham Palace is also strenuously denying the allegations.

But, as Europe correspondent Philip Williams reports, the claims have blown apart the always uneasy calm between the Palace and the British press.

PHILIP WILLIAMS, REPORTER: As fifth in line to the throne, whatever Prince Andrew does or says will never go unnoticed.

So when media reports about a lawsuit in the US emerged linking his name with underage sex, the long period of relative Royal calm was abruptly shattered.

This woman, [REDACTED], is believed to be the person named in court papers as "Jane Doe 3". In a newspaper interview she claims she was used for underage sex by American billionaire Jeffrey Epstein and says she was lent out to his rich and powerful friends, including Prince Andrew. It's claimed she had sex with him three times when she was 17 at Jeffrey Epstein's luxury Caribbean Island home and in New York and London, all denied by Prince Andrew.

VICTORIA MURPHY, UK MIRROR ROYAL CORRESPONDENT: If this doesn't go away quickly, if these allegations continue to be made, if more allegations are added, this could be incredibly damaging, not just for Andrew, but for the monarchy as a whole.

PHILIP WILLIAMS: It all seems a world away from the golden glow of recent Royal events - a wedding that cemented the popularity of Prince William and his bride. Followed of course by the arrival of baby Prince George. And for the Queen, a diamond jubilee, a celebration of 60 years on the throne, reason for her to smile as the nation and beyond said thanks for her never-ending job.

Over the weekend, that run of feel-good luck expired.

Normally with a story like this, Buckingham Palace would be more inclined to stay quiet, not to give any oxygen whatsoever to the sort of claims that have been made. But this time, it's very, very different. Not one, but two statements saying Prince Andrew is completely innocent of all the accusations.

VICTORIA MURPHY: They issued one statement initially in response to the allegations that Prince Andrew had had sex with an underage minor and that was what they were responding to and they were categorically denying that that had been the case. However, in doing that they had left the door open that perhaps he was only denying the fact that she was a minor and questions were being asked about that. So when more of her allegations surfaced, they decided that they needed to release an even stronger denial, categorically denying any sexual contact whatsoever.

PHILIP WILLIAMS: What isn't in dispute is that Prince Andrew and Jeffrey Epstein were good friends over a number of years.

In 2008, Mr Epstein was sentenced to 18 months' jail for soliciting an underage girl for the purposes of prostitution. That, after a controversial plea bargain. He remains a registered sex offender.

Yet in 2011, after his release, Prince Andrew was seen with his old friend in New York Central Park. That cost Prince Andrew an unpaid job he was said to have loved as the UK's Trade and Industry special representative, opening doors for British business overseas.

CHRIS BRYANT, LABOUR MP (March, 2011): But I'm afraid he's now just become a national embarrassment. And my worry is that sometimes when he goes on these trips, I'm not sure whether he's helping us out or he's just helping himself.

PHILIP WILLIAMS: For him, that door closed as a direct result of his association with Jeffrey Epstein.

VICTORIA MURPHY: People who know Prince Andrew have said that he is very loyal to his friends and that that is one of his strong points. However, I think that those closest to him now accept that that particular friendship and the loyalty to Jeffrey Epstein that continued until after he was convicted of paedophilia, I think people are now saying, you know, he accepts that that was a mistake. However, what is being said is that Andrew is only guilty of choosing his friends badly. He's not guilty of anything else.

PHILIP WILLIAMS: Prince Andrew isn't the only one named in the court documents, and while he isn't publicly defending himself, another of those accused certainly is.

Harvard Law Professor **Alan Dershowitz** has been doing the media rounds of the US and beyond. He denies even knowing his accuser, let alone having sex with her.

ALAN DERSHOWITZ, HARVARD LAW SCHOOL: My goal is to bring charges against the client and require her to speak in court. She - if she believes she has been hurt by me and by Prince Andrew, she should be suing us for damages. I welcome that lawsuit. I welcome any opportunity which would put her under oath and require her to state under oath these false allegations.

PHILIP WILLIAMS: Under the plea bargain struck with prosecutors by Jeffrey Epstein, it appears that other potential allegations may not end up tested in court and that could apply to possible co-conspirators, an arrangement alleged victims were not involved with.

Through Palace statements, the Duke of York has unequivocally denied any wrongdoing. He's not charged with anything, nor has he been questioned by police.

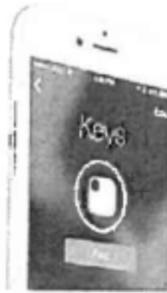
But the Queen's second son is in a spotlight he cannot wish away. His annus horribilis may have just begun.

LEIGH SALES: Philip Williams reporting from London.

LOAD-DATE: January 7, 2015

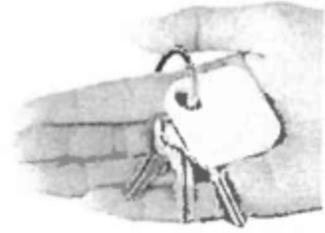
EXHIBIT 3

NEW YORK NEWS PODCASTS SPORTS ENTERTAINMENT OPINION
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Florida judge tosses 'sex slave' claims involving Prince Andrew, Alan Dershowitz

BY OREN YANIV, DAREH GREGORIAN / NEW YORK DAILY NEWS / Published: Tuesday, April 7, 2015, 12:48 PM / Updated: Tuesday, April 7, 2015, 3:11 PM

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SHARE THIS URL: nypd.us/1G03aW9



Prince Andrew with [redacted], who claims Jeffrey Epstein made her a "sex slave."

RELATED STORIES

Prince Andrew's ex defends him in 'sex slave' scandal

FBI might have Jeffrey Epstein's sex tapes: report

Andrew got 'daily massages' at Epstein Fla. home: testimony

'Alleged 'sex slave': I didn't have sex with Bill Clinton

Alan Dershowitz's wife defends against sex claims with gay

A Florida judge has tossed out explosive claims from a woman who said she was forced into having sex with England's Prince Andrew when she was a teenager.

In a ruling Tuesday, Judge Kenneth Marra denied a bid by "Jane Doe No. 3 and Jane Doe No. 4" to intervene in a long-running court case alleging the feds gave preferential treatment to billionaire perv Jeffrey Epstein.

Jane Doe No. 3 — whose identity has been revealed as [redacted], 31 — said in a bombshell court filing that Epstein turned her into a "sex slave" for him and his rich and famous pals when she was just 15.

Among those she said she was pushed into having relations were Prince Andrew — known in the British press as "Randy Andy" — and famed defense lawyer Alan Dershowitz.



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The discovery Jason Owens' he admitted to

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PROMOTED STI



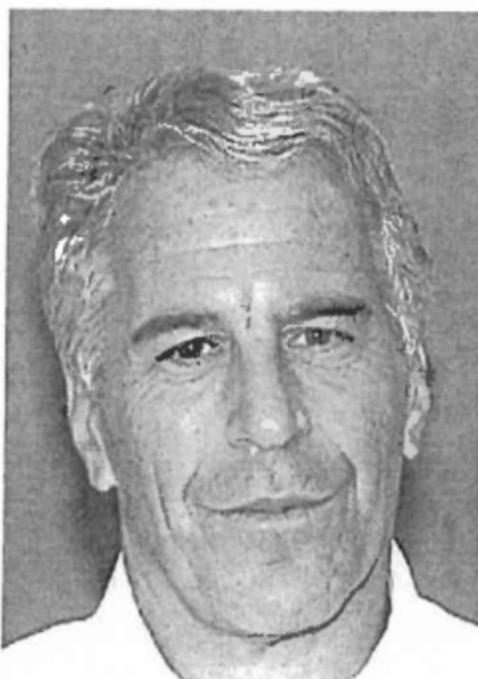


Prince Andrew is seen leaving Verbier ski resort in Switzerland in January amid the brewing sex scandal.



Dershowitz called the claims a libelous smear, and asked Marra to throw out the "outrageous and impertinent allegations."

In his ruling, the judge said the court "has considered Mr. Dershowitz's arguments, but it finds that his intervention is unnecessary" — as were Jane Doe No. 3's "lurid details."



The "sex slave" claims made in the Jeffrey Epstein case against the feds have been tossed by a Florida judge.

in an affidavit, Roberts detailed her alleged trysts with Dershowitz and others, including a wild orgy with Andrew, Epstein, and other apparently underage girls

"The factual details regarding with whom and where the Jane Does engaged in sexual activities are immaterial and impertinent to this central claim ... especially considering that these details involve non-parties who are not related to the respondent Government. These unnecessary details shall be stricken," the judge wrote.

He also found there was no reason for the new Does to intervene in the case at all, since the original two plaintiffs had filed suit on behalf of all of Epstein's victims six years ago.

"The Court finds that justice does not require adding new parties this late in the proceedings," the judge wrote, and "it is entirely unnecessary

for Jane Doe 3 and Jane Doe 4 to proceed as parties in this action."

The judge did say the women could be called as witnesses when the case goes to trial.

"The necessary 'participation' of Jane Doe 3 and Jane Doe 4 in this case can be satisfied by offering their properly supported — and relevant, admissible, and non-cumulative — testimony as needed," Marra wrote.

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Alan Dershowitz was pleased to hear the judge throw out the "sex slave" allegations and says he will be vindicated.

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Dershowitz told the Daily News he's pleased with the decision — but he still plans on going after [redacted] and her lawyers for defamation.

"She was hiding in Colorado ... but we found her and she will have to be deposed," he said. "The end result is that she'll go to jail because she will repeat her lies and we'll be able to prove it and she will end up in prison for perjury."

As for his own reputation: "I'm confident that at the end I'll be vindicated and everybody will understand this is a completely made up story."

Buckingham Palace has denied the allegations against Prince Andrew, which had been bolstered by a picture of the prince with his arm wrapped around [redacted] waist.

A palace spokesman declined to comment on the judge's ruling to The Associated Press.

A lawyer for the four Does, Brad Edwards, vowed to press on with the fight for Epstein's victims, who the feds have acknowledged number in the dozens.

"We are pleased by the Court's ruling recognizing that Jane Doe 3 and 4 have a right to participate without the need for formal intervention," he said.

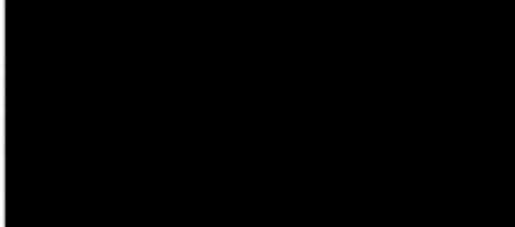
In a statement, "Doe 3" said, "I'm happy to get to participate in this important case."

TAGS: prince andrew , alan dershowitz



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PROMOTED STORIES



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COMMENTS (6)

[Discussion Guidelines]

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SORT

JOHNNIE DONTGIVEADAMN

2 days ago

5

I wonder how much they had to grease the judge to get this tossed?

Like | REPLY

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MARK

2 days ago

1

Sure, because it's not entirely possible that the judge saw that she had a shady story and could have been lying? No, not possible at all, let's go with a tinted hat theory that the judge was bought off instead shall we ...

Like | REPLY

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TIM O'MALLEY

2 days ago

2

Why would she out of the blue accuse Dershowitz? Of all people? Something stinks here

Like | REPLY

SHARE

SHOW MORE COMMENTS



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EXHIBIT 4

◦ Go to DASHBOARD > Appearance > Menus to set up the menu.

Thursday 09 April, 2015

Published On: Wed, Apr 8th, 2015

Court / US / Canada | By Ilan Shavit

After Vindication, Alan Dershowitz Vows to Sue Sex Accuser in Court

Dershowitz he also planning to sue his accuser's attorneys for defamation.



Professor Alan Dershowitz told Newsmax he plans to sue the woman who accused him of sexual misconduct.

Dershowitz spoke after a federal judge on Tuesday U.S. District Court Judge Kenneth Marra had ordered said woman's allegations be removed from the record of an ongoing lawsuit against convicted billionaire pedophile Jeffrey Epstein.

Judge Marra denied a motion by "Jane Doe 3 and Jane Doe 4" to join the lawsuit. He also wrote that the "lurid details" ... "regarding with whom and where the Jane Does engaged in sexual activities are immaterial and impertinent to this central claim ... especially considering that these details involve non-parties who are not related to the respondent Government. These unnecessary details shall be stricken."

The two "non-parties" have been Prince Andrew and Alan Dershowitz.

“We’ve been legally vindicated but my reputation has still been, unfortunately, tarnished in the minds of at least some people by a woman who just lied and made up a story out of whole cloth,” Dershowitz told Newsmax’s Steve Malzberg.

“It was like a drive-by shooting or like somebody scribbling graffiti on a bathroom door,” Dershowitz said.

Read Latest Breaking News from Newsmax.com <http://www.newsmax.com/Newsfront/Alan-Dershowitz-Steve-Malzberg-sexual-misconduct-suing/2015/04/07/id/637044/#ixzz3WhkDlzTe>
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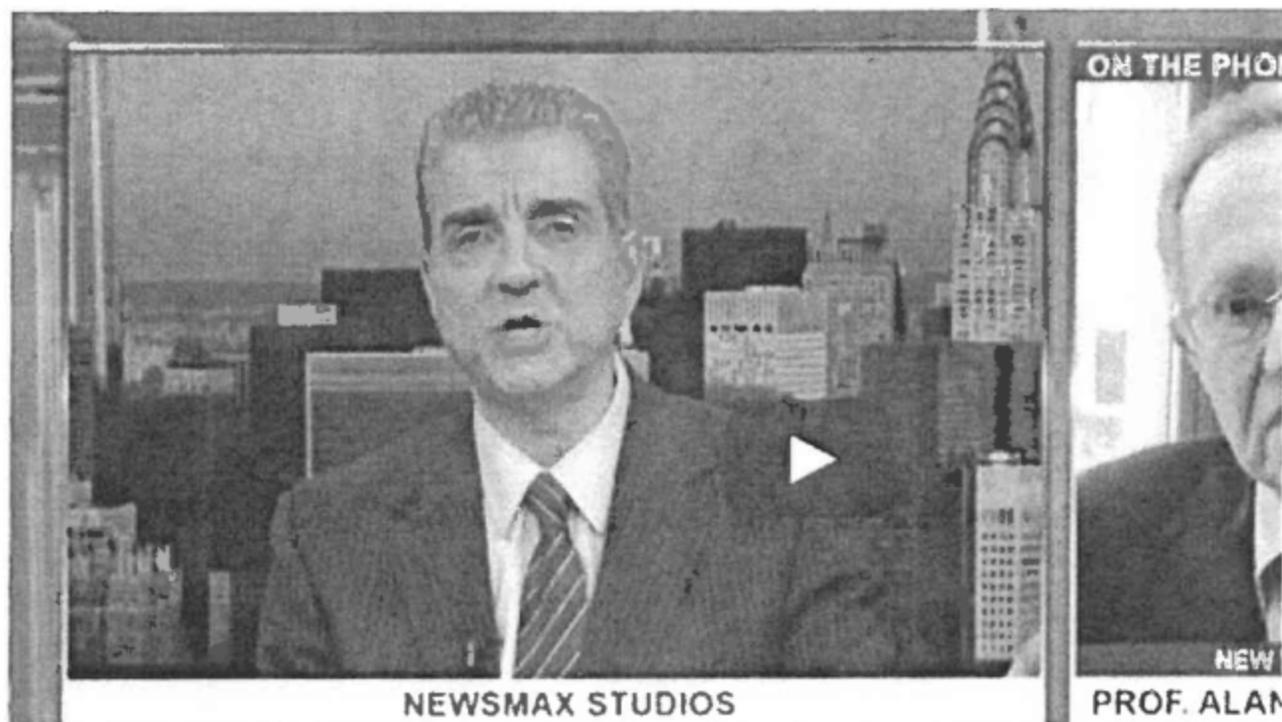
Dershowitz, who originally represented Epstein in his plea deal, said he will now seek to depose “Jane Doe 3.”

“We will persuade the world that she made up the whole story out of whole cloth,” he said.

Dershowitz he also planning to sue his accuser’s attorneys for defamation.

“And we’re considering suing her for defamation as well, but right now she was trying to hide in Colorado and avoid service, but we found her and we served her and now she’ll be subjected to a deposition,” he said.

“And if she repeats what she said previously under oath, she will go to jail because what she said is a complete, total, made-up lie. Not only about me but about many other people.”



Read more about: [Alan Dershowitz](#), [Jane Doe 3](#), [Jeffrey Epstein](#), [Kenneth Marra](#)



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EXHIBIT 5

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CIVIL DIVISION

BRADLEY J. EDWARDS, and
PAUL G. CASSELL,

CASE NO. CACE 15-000072

Plaintiffs,

v.

ALAN DERSHOWITZ,

Defendant.

**AFFIDAVIT OF SIGRID S. MCCAWLEY IN SUPPORT OF
MOTION TO QUASH OR FOR PROTECTIVE ORDER**

1. My name is Sigrid S. McCawley and I am a partner at the law firm of Boies, Schiller & Flexner LLP ("BSF").
2. Jane Doe No. 3 is a non-party in the above-captioned matter and she is a client of BSF.
3. Defendant served BSF with a subpoena that is duplicative of the subpoena it served on BSF's client, Jane Doe No. 3, (*See* Composite Exhibit 1, Defendant's Subpoena to BSF and Non-Party Jane Doe No. 3) as follows:
 - i. BSF Request no. 1 is duplicative of Jane Doe Request no. 17;
 - ii. BSF Request no. 2 is duplicative of Jane Doe Request no. 18;
 - iii. BSF Request no. 3 is duplicative of Jane Doe Request no. 1;
 - iv. BSF Request no. 4 is duplicative of Jane Doe Request no. 2;
 - v. BSF Request no. 5 is duplicative of Jane Doe Request no. 3;
 - vi. BSF Request no. 6 is duplicative of Jane Doe Request no. 5;
 - vii. BSF Request no. 7 is duplicative of Jane Doe Request no. 6;

- viii. BSF Request no. 8 is duplicative of Jane Doe Request no. 7;
- ix. BSF Request no. 9 is duplicative of Jane Doe Request no. 8;
- x. BSF Request no. 10 is duplicative of Jane Doe Request no. 9;
- xi. BSF Request no. 11 is duplicative of Jane Doe Request no. 11;
- xii. BSF Request no. 12 is duplicative of Jane Doe Request no. 12;
- xiii. BSF Request no. 13 is duplicative of Jane Doe Request no. 13;
- xiv. BSF Request no. 14 is duplicative of Jane Doe Request no. 14;
- xv. BSF Request No. 15 is duplicative of Jane Doe Request No. 15;
- xvi. BSF Request no. 16 is duplicative of Jane Doe Request no. 16;
- xvii. BSF Request no. 17 is duplicative of Jane Doe Request no. 19;
- xviii. BSF Request no. 18 is duplicative of Jane Doe Request no. 21;
- xix. BSF Request no. 19 is duplicative of Jane Doe Request no. 22;
- xx. BSF Request no. 20 is duplicative of Jane Doe Request no. 23;
- xxi. BSF Request no. 21 is duplicative of Jane Doe Request no. 24; and
- xxii. BSF Request no. 22 is duplicative of Jane Doe Request no. 25;

xxiii. The only Request that is not duplicative is Request no. 23 which reads: "All documents which are related to when Jane Doe No. 3 allegedly told her attorneys that Alan Dershowitz was among the men she had sexual relations with." BSF contends that any document responsive to this Request is either privileged or of a highly confidential nature. As explained in BSF's Motion to Quash, a non-party should not be required to produce highly confidential documents, particularly when the Request is irrelevant to the underlying action.

4. Defendant's subpoena to BSF requests documents belonging to Jane Doe No. 3. For example, the Requests seek copies of Jane Doe No. 3's diary when she was a minor child. These documents are the property of Jane Doe No. 3 and not BSF. Accordingly, BSF should not be burdened with having to comply with this subpoena.

5. It would cause undue burden and expense for BSF to have to comply with the 23 Requests in Defendant's subpoena. Defendant's subpoena, for example, includes instructions that demand the review of electronic files, including requiring a search of "archive" systems and "back-up tapes". Compliance with the subpoena would require this non-party law firm to have to secure the assistance of IT personnel to fulfill the subpoena demands. In addition, compliance with the subpoena will require attorney and staff time.

6. Defendant has publicly stated that he is seeking discovery in this matter, not for this matter, but instead, because he is considering an action against BSF's client, Jane Doe No. 3. A true and correct copy of the following articles are attached hereto as Composite Exhibit 2:

i. CNN International, New Day, January 6, 2015. "The end result of this case should be she should go to jail, the lawyers should be disbarred and everybody should understand that I am completely and totally innocent."

ii. Australian Broadcasting System, January 6, 2015. "My goal is to bring charges against the client and require her to speak in court."

iii. New York Daily News, April 7, 2015. "She was hiding in Colorado...but we found her and she will have to be deposed. The end result is that she'll go to jail because she will repeat her lies and we'll be able to prove it and she will end up in prison for perjury."

iv. Newsmax, April 8, 2015. "And we're considering suing her for defamation as well, but right now she was trying to hide in Colorado and avoid service, but we found her and we served her and now she'll be subjected to a deposition."

I declare under penalty of perjury that the foregoing are true and correct to the best of my knowledge.

Executed this 9th day of April, 2015.



SIGRID S. MCCAWLEY

STATE OF BROWARD)

) ss.:

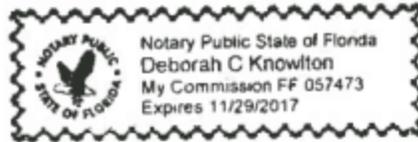
COUNTY OF FLORIDA)

BEFORE ME, the undersigned authority, duly licensed to administer oaths and take acknowledgments, personally appeared Signid V. McCawley, the a partner of Bries, Schiller & Flemer LLP, who produced _____ as identification, who being by me first duly sworn, deposes and says that he/she has read the foregoing answers to interrogatories, and that they are true and correct.

SWORN TO AND SUBSCRIBED before me this 9th day of April, 2015.

Deborah C. Knowlton
Notary Public, State of Florida
My Commission Expires: 11/29/2017

[NOTARY SEAL]



COMPOSITE
EXHIBIT 1

Composite
EXHIBIT 2

COMPOSITE EXHIBIT 1

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

3/31/15
LIT

EJ

SIGRA M.

BRADLEY J. EDWARDS and
PAUL G. CASSELL,

Plaintiffs / Counterclaim Defendants,

v.

ALAN M. DERSHOWITZ,

Defendant / Counterclaim Plaintiff.

SUBPOENA DUCES TECUM

THE STATE OF FLORIDA:

To: **Records Custodian
Boies, Schiller & Flexner LLP
401 East Las Olas Blvd.
Suite 1200
Fort Lauderdale, FL 33301**

YOU ARE COMMANDED to produce the items described in Exhibit A which is attached to this subpoena for inspection and copying. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparing the copies.

You may mail or deliver the copies to the attorney whose name appears on this subpoena or you may appear with the items to be inspected and copied at the offices of Cole, Scott & Kissane, 9150 South Dadeland Boulevard, Suite 1400, Miami, Florida 33156, on or before April 15, 2015.

You have the right to object to the production pursuant to this subpoena at any time before production by giving notice to the attorney whose name appears on this subpoena. If you fail to appear, you may be in contempt of Court.

You are subpoenaed to appear by the following attorney, and unless from this subpoena by this attorney or the Court, you shall respond to this subpoena as directed.

THIS 27th DAY OF March, 2015.

By: s/Thomas E. Scott
THOMAS E. SCOTT
For the Court

Thomas E. Scott
Florida Bar No. 149100
[REDACTED]

Steven R. Safra
Florida Bar No. 057028
[REDACTED]

COLE, SCOTT & KISSANE, P.A.
Cole, Scott & Kissane Building, Suite 1400
9150 South Dadeland Boulevard
Miami, Florida 33156
Phone: [REDACTED]
Fax: [REDACTED]

Richard A. Simpson (admitted pro hac vice)
[REDACTED]

Mary E. Boria (admitted pro hac vice)
[REDACTED]

Ashley E. Eiler (pro hac vice pending)
[REDACTED]

WILEY REIN LLP
1776 K Street NW
Washington, DC 20006
Phone: [REDACTED]
Fax: [REDACTED]

Counsel for Alan M. Dershowitz

GENERAL INSTRUCTIONS

1. This subpoena is directed to You and covers all information in Your possession and all information subject to Your custody or control, wherever they may be located.
2. Each request in this subpoena is to be responded to separately and as thoroughly as possible. The fact that investigation is continuing shall not be used as an excuse for failure to respond to each request as fully as possible. The omission of any document, thing or item of information shall be deemed a representation that such document is not known to You, your counsel, or other representatives at the time of the service of the response.
3. If the attorney/client privilege or a work product protection is asserted in response to any production request, identify the document by its:
 - (a) date;
 - (b) general nature, *e.g.*, letter, memorandum, photograph, computer printout, etc.;
 - (c) subject matter;
 - (d) author or originator;
 - (e) each person indicated as an addressee or copy recipient, or known or believed by you to have received a copy of the document;
 - (f) present custodian of each copy of the document;
 - (g) alleged ground or grounds for withholding production; and
 - (h) sufficient particulars to allow Dershowitz to evaluate the claim of privilege or immunity asserted.

DEFINITIONS

As used in this subpoena, the following definitions shall apply:

1. "All" and "Each" mean all, each, any, and every.
2. "Concerning" and "Concern" mean relates to, refers to, contains, describes, embodies, mentions, constitutes, constituting, supports, corroborates, demonstrates, proves, evidences, shows, refutes, disputes, rebuts, controverts, undercuts and contradicts.
3. "Dershowitz" means Alan M. Dershowitz.
4. "Document(s)" means any and All written, typed, printed, recorded or graphic matter, however produced, reproduced or stored, whether an original or a copy, and whether

prepared, published or released by any person or entity, including but not limited to letters, reports, agreements, correspondence, intra-office or inter-office correspondence, telegrams, minutes or records of meetings, reports or summaries, expressions or statements, lists, drafts and revisions, invoices, receipts, original and preliminary notes, sketches, records, ledgers, contracts, bills of lading, bills, inventories, financial data, maps, memoranda, accounting and financial records, diaries, journals, calendars, statements, work papers, videotapes, photographs, pamphlets, brochures, advertisements, trade letters, press releases, drawings, recaps, tables, articles, summaries of conversations, computer cards, tapes, diskettes, or other means of electronically or magnetically maintaining information, and printouts.

The term "Document(s)" also includes electronically stored data from which information can be obtained either directly or by translation through detection devices or readers; any such document is to be produced in a reasonably legible and usable form. The term "Document(s)" includes All drafts of a Document and All copies that differ in any respect from the original, including any notation, underlining, marking, or information not on the original. The term also includes information stored in, or accessible through, computer or other information retrieval systems (including any computer archives or back-up systems), together with instructions and All other materials necessary to use or interpret such data compilations.

Without limitation on the term "control" as used in the preceding paragraph, a Document is deemed to be in Your control if You have the right to secure the Document or a copy thereof from another person.

5. "Epstein" means Jeffrey Epstein.
6. "Federal Action" means the matter styled *Jane Doe #1, et al. v. United States of America*, Case No. 08-80736-CIV-MARRA/JOHNSON (S.D. Fla.).
7. "Jane Doe # 3" means the individual referred to as "Jane Doe #3" in the Federal Action.
8. "You" and "Your" means the entity to whom this subpoena is addressed, including the Entity's members, employees, past employees, accountants, agents, attorneys, representatives, and all other persons acting or purporting to act on its behalf.

EXHIBIT "A"

1. All Documents Concerning any actual or potential book, television or movie contracts or deals concerning Jane Doe #3's allegations about being a sex slave.
2. All Documents Concerning any monetary payments or other consideration received by Jane Doe #3 from any media outlet in exchange for her statements (whether "on the record" or "off the record") regarding Epstein, Dershowitz, Prince Andrew, Duke of York, and/or being a sex slave.
3. All Documents that reference Dershowitz by name, which support and/or confirm the allegations set forth in Paragraphs 24-31 of Jane Doe #3's Declaration dated January 19, 2015 (Docket Entry #291-1) and/or Paragraph 49 of Jane Doe #3's Declaration dated February 5, 2015 (Docket Entry #310-1), which were filed in the Federal Action.
4. All photographs and video in the original, native format in which they were taken (not a paper copy) of Jane Doe #3 with Dershowitz.
5. All photographs and video in the original, native format in which they were taken (not a paper copy) not produced in response to Request No. 4, above, of Dershowitz at (i) Epstein's Manhattan home in New York City, New York; (ii) Epstein's home in Palm Beach, Florida; (iii) Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Epstein's airplane, on the same date and time that Jane Doe #3 were also present at such location.
6. Any documents and information that support and/or confirm Jane Doe #3's presence at the various locations named in Paragraphs 24-31 of Jane Doe #3's January 19, 2015 Declaration in the Federal Action on the particular dates and times when Dershowitz was also present.
7. Any documents and information that show Dershowitz was present at the various locations named in Paragraphs 24-31 of Jane Doe #3's January 19, 2015 Declaration in the Federal Action on the particular dates and times when Jane Doe #3 alleges to have been present.
8. All statements, written or recorded, that Jane Doe #3 has provided to anyone that reference Dershowitz by name or other description.
9. All notes of, or notes prepared for, any statements or interviews in which Jane Doe #3 referenced Dershowitz by name or other description.
10. All Documents Concerning any communications by Jane Doe #3 or on Jane Doe #3's behalf with any media outlet concerning Dershowitz or the Federal Action, whether or not such communications were "on the record" or "off the record."
11. All notes, writings, photographs, and/or audio or video recordings made or recorded by or of Jane Doe #3 on the dates on which Jane Doe #3 alleges she was present with Dershowitz, including but not limited to Jane Doe #3's calendar, diary or journal entries

on those dates, regardless whether the notes, writings, photographs, and/or audio or video recordings refer to Dershowitz. To the extent that any responsive materials are photographs or video recordings, please provide them in the original, native format in which they were taken (not a paper copy).

12. All Documents Concerning Jane Doe #3's travel to or from locations for those occasions when she alleges she was present with Dershowitz.
13. To the extent not produced in response to the above list of requested Documents, all notes, writings, photographs, and/or audio or video recordings made at any time that refer or relate in any way to Dershowitz.
14. All drafts of declarations or affidavits by Jane Doe #3 that relate in any way to Dershowitz and/or Epstein.
15. All Documents Concerning any telephone, including any cellular telephone, used by Jane Doe #3 between January 1, 1999 and December 31, 2002.
16. Any diary, journal or calendar Concerning Jane Doe #3's activities between January 1, 1999 and December 31, 2002.
17. All Documents Concerning Jane Doe #3's presence at or on (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane from January 1, 1999 through December 31, 2002.
18. All travel records of any kind, including but not limited to tickets, hotel room receipts or other documents Concerning any travel undertaken by Jane Doe #3 between January 1, 1999 and December 31, 2002.
19. All records of any interviews given by Jane Doe #3 to any party Concerning Dershowitz, Epstein, or any of their agents or associates.
20. All manuscripts and/or other writings, whether published or unpublished, created in whole or in part by Jane Doe #3, Concerning Epstein and any of his agents or associates.
21. All Documents Concerning Jane Doe #3's allegations that she met former President Bill Clinton, former Vice President Al Gore and/or Mary Elizabeth "Tipper" Gore on Little Saint James island in the U.S. Virgin Islands.
22. All Documents Concerning your retention by Jane Doe #3, including, but not limited to: signed letter of retainer, retention agreement, explanation of fees and/or any document describing the scope of retention.

23. All Documents which are related to when Jane Doe #3 allegedly told her attorneys that Alan Dershowitz was among the men she had sexual relations with.

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT IN AND
FOR BROWARD COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and
PAUL G. CASSELL,

Plaintiffs/Counterclaim Defendants,

vs.

ALAN M. DERSHOWITZ,

Defendant/Counterclaim Plaintiff.

_____ /

CERTIFICATE OF NON OBJECTION

Defendant ALAN M. DERSHOWITZ ("Defendant"), by and through his undersigned counsel, hereby files this certificate that no objections were received to the subpoena duces tecum directed to Boies, Schiller & Flexner, LLP.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-mail on March 27, 2015 to: Jack Scarola, Esquire, Searcy Denny et al [REDACTED] and [REDACTED] counsel for Plaintiff.

COLE, SCOTT & KISSANE, P.A.
Cole, Scott & Kissane Building, Suite 1400
9150 South Dadeland Blvd.
Miami, Florida 33156

P: [REDACTED]
F: [REDACTED]

By: /s/ Thomas Scott
THOMAS E. SCOTT
FBN: 149100
STEVEN R. SAFRA
FBN: 057028
E-Mail: [REDACTED]
E-Mail: [REDACTED]
Second: [REDACTED]
Second: [REDACTED]

Richard A. Simpson (admitted pro hac vice)

[REDACTED]
Mary E. Borja (admitted pro hac vice)
mborja@wileyrein.com

Ashley E. Eiler (pro hac vice pending)

[REDACTED]
WILEY REIN LLP
1776 K Street NW
Washington, DC 20006
Phone: [REDACTED]
Fax: [REDACTED]

Counsel for Alan M. Dershowitz

District Court, Fremont County, Colorado
Court Address:
136 Justice Center Rd
Canon City, CO 81212

Plaintiff(s)/Petitioner(s): Edwards, et al.

v

Defendant(s)/Respondent(s): Dershowitz

▲ COURT USE ONLY ▲

Case Number: 2015CV30051

Division: Courtroom

SUBPOENA TO ATTEND ATTEND AND PRODUCE

To [REDACTED]

You are ordered to attend and give testimony at the District Court of Fremont County located at 136 Justice Center Road, Canon City, CO 81212, Room #105 on Tuesday May 12, 2015 at 9:30 a.m. as a witness for the

Plaintiff(s)/Petitioner(s) Defendant(s)/Respondent(s) in this action.

At that time and place, you also shall produce the following items now in your custody or control:

See attached Schedule A.

Names, addresses and telephone numbers of all counsel of record in this action and of any party represented by counsel are as follows:

Name	Address	Telephone Number
For Plaintiffs Bradley J. Edwards and Paul G. Cassell Jack Scarola, FL Bar No. 169440 Searcy Denney Scarola Barnhart & Shipley, PA	2139 Palm Beach Lakes Blvd, West Palm Beach, FL 33409	[REDACTED]
For Defendant Alan M. Dershowitz Thomas E. Scott, Florida Bar No. 149100 Steven R. Safra, Florida Bar No. 057026 Cole, Scott & Kissane, PA	9150 South Dadeland Blvd., #1400 Miami, FL 33156	[REDACTED]

Clerk/Deputy Clerk or Attorney

AFIDAVIT OF SERVICE

I, the undersigned, being a party to the action are hereby sworn to
_____ (State

_____ at the Witness or by leaving _____
_____ occasions but have not been _____

_____ County

Signature of Process Server

Name (Print or type)

Notary Public / Deputy Clerk

Notary Public / Deputy Clerk

SCHEDULE "A"

1. All documents that reference by name, Alan M. Dershowitz¹ which support and/or confirm the allegations set forth in Paragraphs 24-31 of your Declaration dated January 19, 2015 and/or Paragraph 49 of your Declaration dated February 5, 2015, which were filed with the United States District Court for the Southern District of Florida, in Jane Doe #1 and Jane Doe #2 v. United States of America, Case No. 08-80736-CIV-MARRA/JOINSON, [ECF No. 291-1] (the "Federal Action").
2. All photographs and video in the original, native format in which they were taken (not a paper copy) of you with Alan M. Dershowitz.
3. All photographs and video in the original, native format in which they were taken (not a paper copy) not produced in response to Request No. 2, above, of Alan M. Dershowitz at (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane, on the same date and time that you were also present at such location.
4. All photographs and video in the original, native format in which they were taken (not a paper copy) of you not produced in response to Request No. 3, above, that evidence and/or show you were present at the same location as Alan M. Dershowitz on that same date and time.
5. Any documents and information that support and/or confirm your presence at the various locations named in Paragraphs 24-31 of your Declaration on the particular dates and times when Alan M. Dershowitz was also present.
6. Any documents and information that show Alan M. Dershowitz was present at the various locations named in Paragraphs 24-31 of your Declaration on the particular dates and times when you allege to have been present in your response to Request No. 5, above.
7. All statements, written or recorded, which you have provided to anyone that reference by name, Alan M. Dershowitz.
8. All notes of, or notes prepared for, any statements or interviews in which you referenced by name or other description, Alan M. Dershowitz.
9. All documents concerning any communications by you or on your behalf with any media outlet concerning Alan M. Dershowitz or the Federal Action, whether or not such communications were "on the record" or "off the record."
10. All notes, writings, photographs, and/or audio or video recordings made or recorded by or of you on the dates on which you allege you were present with Alan M. Dershowitz, including but not limited to your calendar, diary or journal entries on those dates, regardless whether the notes, writings, photographs, and/or audio or video recordings refer to Mr. Dershowitz. To the extent

¹ For purposes of this Schedule "A", reference to "Alan M. Dershowitz" herein shall mean and refer to any reference to the Defendant in this action, including but not limited to, as "Alan", "Alan M. Dershowitz", "Professor Dershowitz", or "Dershowitz", and the like.

that any responsive materials are photographs or video recordings, please provide them in the original, native format in which they were taken (not a paper copy).

12. All documents relating to your travel to or from London for any reason, whether you were present with Alan M. Dershowitz.
13. To the extent not produced in response to the above list of requested documents, all notes, writings, photographs, and/or audio or video recordings made at any time that refer or relate in any way to Alan M. Dershowitz.
14. All drafts of declarations or affidavits by you that relate in any way to Alan M. Dershowitz and/or Jeffrey Epstein.
15. All documents relating to any telephone, including any cellular telephone, used by you between January 1, 1999 and December 31, 2002.
16. Any diary, journal or calendar concerning your activities between January 1, 1999 and December 31, 2002.
17. All documents concerning any actual or potential book, television or movie deals concerning your allegations about being a sex slave.
18. All documents concerning any monetary payments or other consideration received by you from any media outlet in exchange for your statements (whether "on the record" or "off the record") regarding Jeffrey Epstein, Alan M. Dershowitz, Prince Andrew, Duke of York, and/or being a sex slave.
19. All documents showing, concerning, relating or referring to when you were at or on (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane from January 1, 1999 through December 31, 2002.
20. All documents showing any payments or remuneration of any kind made by Jeffrey Epstein or any of his agents or associates to you from January 1, 1999 through December 31, 2002.
21. All travel records of any kind, including but not limited to tickets, hotel room receipts or other documents concerning, relating or referring to any travel undertaken by you between January 1, 1999 and December 31, 2002.
22. All records of any interviews given by you to any party concerning, relating or referring to Jeffrey Epstein or any of his agents or associates.
23. All manuscripts and/or other writings, whether published or unpublished, created in whole or in part by you, concerning, relating or referring to Jeffrey Epstein and any of his agents or associates.
24. All documents concerning, relating or referring to your assertions that you met former President Bill Clinton, former Vice President Al Gore and/or Mary Elizabeth "Tipper" Gore on Little Saint James island in the U.S. Virgin Islands.

- 25 All documents concerning your retention of the law firm Boies, Schiller & Flexner LLP, including but not limited to, signed letter of retainer, retention agreement, explanation of fees, and/or any documents describing the scope of retention.

District Court Fremont County Colorado
Court Address:
136 Justice Center Rd
Canon City, CO 81212

Plaintiff(s)/Petitioner(s): Edwards, et al.

v.

Defendant(s)/Respondent(s): Dershowitz

COURT USE ONLY

Case Number:

Division:

Courroom:

SUBPOENA TO ATTEND ATTEND AND PRODUCE

To: Jane Doe #3 (address redacted for purpose of court filing)

You are ordered to attend and give testimony at the District Court of Fremont County, located at: 136 Justice Center Road, Canon City, CO 81212, Room # _____ on Tuesday, May 12 2015, at 9:30 a.m. as a witness for the Plaintiff(s)/Petitioner(s) Defendant(s)/Respondent(s) in this action.

At that time and place, you also shall produce the following items now in your custody or control:

See attached Schedule A.

Names, addresses and telephone numbers of all counsel of record in this action and of any party represented by counsel are as follows:

Name	Address	Telephone Number
For Plaintiffs Bradley J. Edwards and Paul G. Cassell Jack Scarola, FL Bar No. 169440 Searcy Denney Scarola Barnhart & Shipley, PA	2130 Palm Beach Lakes Blvd. West Palm Beach, FL 33409	[REDACTED]
For Defendant Alan M. Dershowitz Thomas E. Scott, Florida Bar No. 149100 Steven R. Safra, Florida Bar No. 057078 Cole, Scott & Kissane, PA	9150 South Dadeland Blvd. #1400 Miami, FL 33156	[REDACTED]

DEBORAH SATHER STRINGARI
DISTRICT CLERK OF FREMONT COUNTY

Date: _____

Attorney



AFFIDAVIT OF SERVICE

I declare under oath that, I am 18 years or older and not a party to the action and that I served this Subpoena to

Attend Attend and Produce to the Witness in _____ (County) _____ (State)

on _____ (date) at the following location _____

Check one:

By handing it to a person identified to me as the Witness or by leaving it with the Witness who refused service,

I attempted to serve the Witness on _____ occasions but have not been able to locate the Witness.

Private process server

Sheriff, _____ County

Fee \$ _____ Mileage \$ _____

Signature of Process Server

Name (Print or type)

My Commission Expires _____

Notary Public /Deputy Clerk Date

SCHEDULE "A"

1. All documents that reference by name, Alan M. Dershowitz,¹ which support and/or confirm the allegations set forth in Paragraphs 24-31 of your Declaration dated January 19, 2015 and/or Paragraph 49 of your Declaration dated February 5, 2015, which were filed with the United States District Court for the Southern District of Florida, in Jane Doe #1 and Jane Doe #2 v. United States of America, Case No. 08-80736-CIV-MARRA/JOHNSON, [ECF No. 291-1] (the "Federal Action").
2. All photographs and video in the original, native format in which they were taken (not a paper copy) of you with Alan M. Dershowitz.
3. All photographs and video in the original, native format in which they were taken (not a paper copy) not produced in response to Request No. 2, above, of Alan M. Dershowitz at (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane, on the same date and time that you were also present at such location.
4. All photographs and video in the original, native format in which they were taken (not a paper copy) of you not produced in response to Request No. 3, above, that evidence and/or show you were present at the same location as Alan M. Dershowitz on that same date and time.
5. Any documents and information that support and/or confirm your presence at the various locations named in Paragraphs 24-31 of your Declaration on the particular dates and times when Alan M. Dershowitz was also present.
6. Any documents and information that show Alan M. Dershowitz was present at the various locations named in Paragraphs 24-31 of your Declaration on the particular dates and times when you allege to have been present in your response to Request No. 5, above.
7. All statements, written or recorded, which you have provided to anyone that reference by name, Alan M. Dershowitz.
8. All notes of, or notes prepared for, any statements or interviews in which you referenced by name or other description, Alan M. Dershowitz.
9. All documents concerning any communications by you or on your behalf with any media outlet concerning Alan M. Dershowitz or the Federal Action, whether or not such communications were "on the record" or "off the record."

¹ For purposes of this Schedule "A", reference to "Alan M. Dershowitz" herein shall mean and refer to any reference to the Defendant in this action, including but not limited to, as "Alan", "Alan M. Dershowitz", "Professor Dershowitz", or "Dershowitz", and the like.

10. All notes, writings, photographs and or audio or video recordings made or recorded by or of you on the dates on which you allege you were present with Alan M. Dershowitz, including but not limited to your calendar, diary or journal entries on those dates, regardless whether the notes, writings, photographs, and/or audio or video recordings refer to Mr. Dershowitz. To the extent that any responsive materials are photographs or video recordings, please provide them in the original, native format in which they were taken (not a paper copy).
12. All documents relating to your travel to or from locations for those occasions when you allege you were present with Alan M. Dershowitz.
13. To the extent not produced in response to the above list of requested documents, all notes, writings, photographs, and/or audio or video recordings made at any time that refer or relate in any way to Alan M. Dershowitz.
14. All drafts of declarations or affidavits by you that relate in any way to Alan M. Dershowitz and/or Jeffrey Epstein.
15. All documents relating to any telephone, including any cellular telephone, used by you between January 1, 1999 and December 31, 2002.
16. Any diary, journal or calendar concerning your activities between January 1, 1999 and December 31, 2002.
17. All documents concerning any actual or potential book, television or movie deals concerning your allegations about being a sex slave.
18. All documents concerning any monetary payments or other consideration received by you from any media outlet in exchange for your statements (whether "on the record" or "off the record") regarding Jeffrey Epstein, Alan M. Dershowitz, Prince Andrew, Duke of York, and/or being a sex slave.
19. All documents showing, concerning, relating or referring to when you were at or on (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane from January 1, 1999 through December 31, 2002.
20. All documents showing any payments or remuneration of any kind made by Jeffrey Epstein or any of his agents or associates to you from January 1, 1999 through December 31, 2002.
21. All travel records of any kind, including but not limited to tickets, hotel room receipts or other documents concerning, relating or referring to any travel undertaken by you between January 1, 1999 and December 31, 2002.

22. All records of any interviews given by you to any party concerning, relating or referring to Jeffrey Epstein or any of his agents or associates.
23. All manuscripts and/or other writings, whether published or unpublished, created in whole or in part by you, concerning, relating or referring to Jeffrey Epstein and any of his agents or associates.
24. All documents concerning, relating or referring to your assertions that you met former President Bill Clinton, former Vice President Al Gore and/or Mary Elizabeth "Tipper" Gore on Little Saint James island in the U.S. Virgin Islands.
25. All documents concerning your retention of the law firm Boies, Schiller & Flexner LLP, including but not limited to: signed letter of retainer, retention agreement, explanation of fees, and/or any documents describing the scope of retention.

ATTACHMENT A

C.R.C.P. 45 requires the party issuing a subpoena for the production of records or a tangible thing to provide the following information:

(c) Protecting a Person Subject to a Subpoena.

(i) **Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction, which may include lost earnings and reasonable attorney's fees, on a party or attorney who fails to comply.

(2) Command to Produce Records or Tangible Things.

(A) **Attendance not required.** A person commanded to produce records or tangible things need not attend in person at the place of production unless also commanded to attend for a deposition, hearing, or trial.

(B) **For production of privileged records.**

(I) If a subpoena commands production of records from a person who provides services subject to one of the privileges established by C.R.S. § 13-90-107, or from the records custodian for that person, which records pertain to services performed by or at the direction of that person ("privileged records"), such a subpoena must be accompanied by an authorization signed by the privilege holder or holders or by a court order authorizing production of such records.

(II) Prior to the entry of an order for a subpoena to obtain the privileged records, the court shall consider the rights of the privilege holder or holders in such privileged records, including an appropriate means of notice to the privilege holder or holders or whether any objection to production may be resolved by redaction.

(III) If a subpoena for privileged records does not include a signed authorization or court order permitting the privileged records to be produced by means of subpoena, the subpoenaed person shall not appear to testify and shall not disclose any of the privileged records to the party who issued the subpoena.

(C) **Objections.** Any party or the person subpoenaed to produce records or tangible things may submit to the party issuing the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials. The objection must be submitted before the earlier of the time specified for compliance or 14 days after the subpoena is served. If objection is made, the party issuing the subpoena shall promptly serve a copy of the objection on all other parties. If an objection is made, the party issuing the subpoena is not entitled to inspect, copy, test or sample the materials except pursuant to an order of the court from which the subpoena was issued. If an objection is made, at any time on notice to the subpoenaed person and the other parties, the party issuing the subpoena may move the issuing court for an order compelling production.

(3) Quashing or Modifying a Subpoena.

(A) When required. On motion made promptly and in any event at or before the time specified in the subpoena for compliance, the issuing court must quash or modify a subpoena that:

(I) Fails to allow a reasonable time to comply;

(II) Requires a person who is neither a party nor a party's officer to attend a deposition in any county other than where the person resides or is employed or transacts his business in person, or at such other convenient place as is fixed by an order of court;

(III) Requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(IV) Subjects a person to undue burden.

(B) When permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion made promptly and in any event at or before the time specified in the subpoena for compliance, quash or modify the subpoena if it requires:

(I) Disclosing a trade secret or other confidential, research, development, or commercial information; or

(II) Disclosing an unretained expert's opinion or information that does not describe specific matters in dispute and results from the expert's study that was not requested by a party.

(C) Specifying conditions as an alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order attendance or production under specified conditions if the issuing party:

(I) Shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(II) Ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to Subpoena.

(1) Producing Records or Tangible Things.

(A) Unless agreed in writing by all parties, the privilege holder or holders and the person subpoenaed, production shall not be made until at least 14 days after service of the subpoena, except that, in the case of an expedited hearing pursuant to these rules or any statute, in the absence of such agreement, production shall be made only at the place, date and time for compliance set forth in the subpoena; and

(B) If not objected to, a person responding to a subpoena to produce records or tangible things must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand and must permit inspection, copying, testing, or sampling of the materials.

(2) Claiming Privilege or Protection.

(A) Information withheld. Unless the subpoena is subject to subsection (c)(2)(B) of this rule relating to production of privileged records, a person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(I) Make the claim expressly; and

(II) Describe the nature of the withheld records or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

COMPOSITE EXHIBIT 2

CNN

SHOW: New Day 8:30 AM EST

January 6, 2015 Tuesday

TRANSCRIPT: 010606CN.V42

SECTION: NEWS; International

LENGTH: 3114 words

HEADLINE: Plan Crash Survivor's Steps; Celebrities Fight Sex Scandals;
Remembering Mario Cuomo

BYLINE: Alisyn Camerota, Martin Savidge, John Berman, Michaela Pereira, Paul Callan, Chris Cuomo, Ana Cabrera

GUESTS: Wendy Murphy

HIGHLIGHT:

Friday night, seven-year-old Sailor Gutzler freed herself from the upside down wreckage of her family's plane, moving past the bodies of her mother, father, sister and cousin, and walked nearly a mile to Larry Wilkins' home in remote western Kentucky to get help. There are new developments in the sex scandal involving Prince Andrew and famed attorney **Alan Dershowitz**, including the fact that Dershowitz has counter sued [REDACTED]. Chris Cuomo, the son of the former governor of New York Mario Cuomo, reflects on his father's legacy as a politician and family man.

BODY:

JOHN BERMAN: All right, 32 minutes after the hour.

Buckingham Palace took the rare step to speak out about the sex abuse accusations against Prince Andrew, but is talking about it really the best strategy? How to handle ugly accusations, next.

CAMEROTA: New developments in the sex scandal involving Prince Andrew and famed attorney **Alan Dershowitz**. Moments ago we learned that **Alan Dershowitz** has counter sued [REDACTED], that's the woman who says that the lawyer sexually abused her when she was a teenager. Dershowitz is demanding his name be removed from her lawsuit and is asking for damages. Roberts says that a wealthy investor forced her into sex slavery when she was a teenager to please his powerful friends, including Dershowitz and Prince Andrew. The accuser now says she is being re-victimized. All of this raising big questions of how public figures should fight back against ugly accusations.

Let's bring in Paul Callan. He's a CNN legal analyst, criminal defense attorney and former prosecutor to talk about all this, also former prosecutor Wendy Murphy will join. She's an adjunct professor of sexual violence at New England Law in Boston.

Great to see both of you.

OK, let's start with the news this morning. Paul, **Alan Dershowitz**, hours ago, has filed this countersuit in Florida because he feels he's being defamed by this lawsuit by this woman, [REDACTED]. CNN is naming her because she has gone public with her name. So is that the best way for celebrities and high-profile people to handle allegations like this?

PAUL CALLAN, CNN LEGAL ANALYST: Well, **Alan Dershowitz** has done something you never see done in these cases. He's gone nuclear. I mean, he's going apoplectic. He's threatening to sue Roberts and he's starting his own lawsuit. Usually you try to make the whole thing go away so it's forgotten.

There's a complexity to this lawsuit because the allegations against Dershowitz, that he slept with this 15-year-old, and, incidentally, Prince Andrew as well, were included in court documents related to another lawsuit. And normally, anything you say in a court document relating to a pending lawsuit is, there's immunity. You can't sue somebody for saying that. So Dershowitz was baiting Roberts saying, why don't you say it publicly and I'm going to sue you because it's a lie. But apparently he must have stumbled on some theory that would give him grounds to sue around this court immunity doctrine. So it will be interesting to see it today.

CAMEROTA: Yes. Wendy, we have an example of **Alan Dershowitz** being so angry and so vociferous in denying these charges yesterday on NEW DAY. Watch this.

(BEGIN VIDEO CLIP)

ALAN DERSHOWITZ, ATTORNEY: I will take action. I am filing today a sworn affidavit denying categorically the truth. I'm seeking to intervene in the case. I am challenging her to file rape charges against me. I waive any statute of limitations, any immunity, because if she files a false rape charge against me, she goes to jail. The end result of this case should be she should go to jail, the lawyers should be disbarred and everybody should understand that I am completely and totally innocent.

(END VIDEO CLIP)

CAMEROTA: Wendy, what do you think about his strategy? Because there's one school of thought that says you never even dignify the allegations with a response.

WENDY MURPHY, FORMER PROSECUTOR: Yes, I mean the problem is he is almost in a protest too much state of mind for me. You know, I think the way the prince is handling it is, in a sense, more credible because it's more restrained in that exact way, Alisyn, we don't dignify these kinds of things. Of course it's silly. Of course it's not true.

You know, the problem with **Alan Dershowitz's** position is, he doesn't really know all of the evidence that they have. I mean what if this woman has, you know, intimate knowledge of things about his body parts, for example, that will be unassailable proof that, in fact, she did have access to his body. The kind of thing that no matter how much he yells and screams, he won't be able to rebut. That could be some pretty explosive proof against him.

CAMEROTA: It could be but --

MURPHY: I'm glad he did it.

CAMEROTA: Yes, I mean, you have to - MURPHY: Go ahead.

CAMEROTA: You have to assume that because he's make so vocal and so public a response that he believes that there's nothing like that out there.

Wendy, let me just stop you for a second -

MURPHY: Yes.

CAMEROTA: Because I want to tell you the victim in - the alleged victim in this case, [REDACTED], has now responded to CNN and **Alan Dershowitz** for calling her a liar. Let me tell you what she says. "It appears I am now being unjustly victimized again. These types of aggressive attacks on me are exactly the reason why sexual abuse victims typically remain silent and the reason why I did for a long time. That trend should change. I'm not going to be bullied into silence."

Wendy, your thoughts on her response?

MURPHY: Yes, I -- you know, it is a reason, in my work, you know, in decades of this work, it is something victims talk about a lot. I'm not going to speak out, especially against a wealthy, powerful, and influential person because they will have the ability to sue me falsely. That's the fear that a lot of real victims have.

Look, if **Alan Dershowitz** wants to use the legal system to demonstrate his innocence, he has the right to do that. The problem is, now that he's filed a public claim, the airing of all the details will come out, and what's he going to do if there is some kind of unassailable evidence against him? I mean he said, for example, he's only been at Jeffrey Epstein's house once and it was with his wife and children. What if it comes out that he was actually there, and there are photographs of him there on another occasion?

CALLAN: Well, you have to - you know, but, Wendy, I think you have to assume, Dershowitz can't be that stupid. I mean he taught at Harvard for long enough that I assume that basic facts like that he's going to be certain on. And if Dershowitz is in fact innocent of this charge, then he's not worried about body parts or locations where sex took place if no sex did take place.

CAMEROTA: Dershowitz also called for [REDACTED] attorneys to be disbarred. He believes they should never have taken this case. Let me quickly read to you their statement in response to **Alan Dershowitz**. "Out of respect for the courts desire to keep this case from being litigated in the press, we are not going to respond at this time to specific claims of indignation by anyone. Nevertheless, we would be pleased to consider any sworn testimony and documentary evidence Mr. Dershowitz would like to provide which he contends would refute any of our allegations."

Paul Callan, Wendy Murphy -

MURPHY: Yes. CAMEROTA: We have to leave it there. We're running out of time. But,

obviously, this case is not going away with **Alan Dershowitz's** new legal action this morning. We'll take it up again. Thanks so much for being here.

We'd love to know what you think about all this. You can tweet us @newday on the best way to handle allegations like this.

Let's go over to John.

BERMAN: All right, thanks, Alisyn.

An American giant is gone, but his legacy lives on. Our friend and colleague, Chris Cuomo, remembers his father, former New York Governor Mario Cuomo. A touching tribute that you do not want to miss, it's coming up next.

PEREIRA: So, the funeral for former New York governor Mario Cuomo gets under way in just over two hours right here in New York City. Dignitaries including Bill and Hillary Clinton, Attorney General Eric Holder are expected to pay their respects. You know, Chris mentioned to us, our NEW DAY family, that his father's life has served as a lesson for him since he was a very little boy, but that even now his pop is, as he called him, is still teaching him a lesson about what endures.

(BEGIN VIDEOTAPE)

MARIO CUOMO, FORMER GOVERNOR OF NEW YORK: When it's over, I want people to say, now, there was an honest person.

CHRIS CUOMO, CNN ANCHOR (voice-over): Pop's body is gone. I know because I counted out his pulse until his heart fell silent, 5:15 p.m. His two favorite numbers, 5 and 15. So now his baggy, brown eyes, solid grip of soft, thick fingers, oaken body, they're all gone. But what was most important about my father and to him has passed on.

Passed on as in still exists, just in a different way. His spirit passed on to his creator, the spirit of his message endures in us. Timeless and timely, a call to remember that if all do not share in America's success, there is no real success.

M. CUOMO: We can make it all the way with the whole family intact, and we have more than once, wagon train after wagon train, to new frontiers of education, housing, peace, the whole family aboard, constantly reaching out to extend and enlarge that family, all those struggling to claim some small share of America.

C. CUOMO: Our interconnectedness, our diversity as America's true strength. The value found in immigrants like our family desperate to work, to be part of the dream.

M. CUOMO: Thank you very much.

C. CUOMO: Two speeches in eight weeks would define his political life for many of you, the keynote in 1984.

UNIDENTIFIED MALE: Ronald Reagan rode into the '80s on a political white horse.

C. CUOMO: When he took on Ronald Reagan's shining city.

M. CUOMO: There are people who sleep in the city's streets, in the gutter, where the glitter doesn't show.

C. CUOMO: And his talk at Notre Dame, where he took on his church's notion of a Catholic politician.

M. CUOMO: We know that the price of seeking to force our belief on others is that they might someday force their belief on us. I protect my right to be a Catholic by preserving your right to be anything else you choose.

C. CUOMO: The man liked a challenge. Both relied on his core belief, we are here to help as many as we can in the best way we can, and that means protecting freedom, especially freedom from oppression. You will hear him called Hamlet on the Hudson. Question it. It's a media phrase more than a matter of fact. Pop did not think he should run for president.

M. CUOMO: Has nothing to do with my chances. It has everything to do with my job as governor, and I don't see that I can do both. Therefore, I will not pursue the presidency.

C. CUOMO: Many could not, or would not, accept that and tried publicly and privately to push him to do otherwise. For better or worse, that's what separated my father from other politicians. He, in fact, did not vacillate, and until the day he died, I never heard him regret the decision, period. But that is merely politics, which can't be forgotten quickly enough. What really matters has certainly been passed on to me, and my siblings, and our kids and that was pop's love, like a big bear hug on your heart kind of love. His unique sense of humor could be a weapon and a salve.

M. CUOMO: Christopher, you have - -

(LAUGHTER)

M. CUOMO: Let me tell you, Christopher. You have found so many unusual ways to heap new expenses on this family. You really have. I mean, and you've done it not after, you know, a sweating effort, he's done it naturally.

C. CUOMO: Who to be, how to be, from the simple, a handshake is firm, a tie is tied in a Windsor knot, a man shines his own shoes and does so often. He carries a hanky, one for others, one for himself. He wears a hat, not a cap, unless it's a cheese cutter. He always has cash and does not go Dutch. Pass first, shoot second. Play hard, and then play harder. From that to the sublime, all that matters in life is devotion to something bigger than yourself, family, the less fortunate, take up for them always. His passion for purpose, love recklessly, fight the good fight fiercely, outwork everyone. M. CUOMO: One of the simple things I wanted to achieve is I want to be governor, I want to be the hardest working there ever was.

C. CUOMO: Compete hard or not at all.

M. CUOMO: So far, you know, we haven't lost all year.

C. CUOMO: And never as a function of the chance of success.

M. CUOMO: This is our first game.

C. CUOMO: And for all the requirements on an individual, the most important was a command for the collective. Collaborate in making this world a better place.

M. CUOMO: What is our mission in this place? Your job is to make it as good as you can make it. That's all there is. There is no other significance.

C. CUOMO: None of that could ever be buried. Living on in the hearts, and minds, and actions of those who bear his name, who heeded his call to action then and now, that all will pass on. The man himself is gone. The father I went to in times of distress is not there. The truth hurts, pop would say, and this truth hurts worse than I imagined. But I also know what pop would tell me to do. Wipe my face, let my kids see that I love them, be there for my family, and do the right thing. And I will, pop, just like you.

M. CUOMO: Just keep going forward believing ever more deeply that it's right to give to people and to the world.

(END VIDEOTAPE)

PEREIRA: What a powerful tribute to his dad.

BERMAN: Like a big bear hug, I think, on all of our hearts as Chris would say so nicely in that piece.

CAMEROTA: And we got to know Mario Cuomo so much better through Chris' eyes. That was a real gift.

BERMAN: And we got to see, you know, take the stuffing out of Chris, too, sitting there as a young boy. It was amazing.

PEREIRA: But, you know, he loves in the very same way that his dad did. Have you noticed that?

CAMEROTA: Yes.

BERMAN: Big, big.

CAMEROTA: Beautiful. We'll be right back.

CAMEROTA: As you all know, Chris Cuomo loves telling the stories of people who are making an impact. So here's on such story. Former NFL player Ricardo Silva went from studying playbooks to textbooks. Today he's a high school math teacher motivating his students to impact your world. Here's Chris Cuomo.

(BEGIN VIDEOTAPE)

RICARDO SILVA, FORMER NFL PLAYER: You have four minutes, four minutes until competition.

C. CUOMO: Ricardo Silva is using his competitive edge to make math count for these high school students in Washington, D.C.

SILVA: Number three is what? My hope is to bring awareness to the students. Not just geometry, but total life outcomes. You can do whatever you want through education.

C. CUOMO: Silva's first job wasn't in a classroom, it was on a football field playing for the Detroit Lions.

SILVA: My mission was to get to college and start in the NFL. Now that's moved on to something more meaningful to me, which is providing opportunities to kids that do not necessarily know how to get where they need to be.

C. CUOMO: Helping Silva do just that is Teach for America. The program offers free classroom training to college graduates and professionals from various backgrounds. In exchange they teach in an underserved school for two years.

SILVA: Kids that have low socioeconomic status are, you know, not achieving as well as their more affluent counterparts, and we're trying to close the educational achievement gap. This is why I'm here.

C. CUOMO: It's certainly not for the paycheck or the ease of the job.

SILVA: Football, all you have to do is wake up every day, work out and do what the coaches tell you to do. In school you have to motivate young teenagers who are more interested in their social media outlets than math.

C. CUOMO: A seemingly impossible task, but Silva is up for the challenge.

SILVA: What's the first thing that we must do?

All I had was one person believing in me my entire life, which was my mom, and I feel like I can bring that to the kids.

Way to go, (INAUDIBLE).

All they need was one person telling them that they can do it and they can be successful.

(END VIDEOTAPE)

PEREIRA: And he's that one person.

BERMAN: Man, motivating kids tougher than any NFL linebacker, that's for sure.

CAMEROTA: Yes, right. So, for more on how you can help, go to CNN.com/impact.

BERMAN: All right, it is time now for "NEWSROOM" with Ana Cabrera who is in today for Carol Costello.

Ana, take it away.

ANA CABRERA, CNN ANCHOR: Good morning guys, and I haven't even said happy new year to you yet, so happy new year.

CAMEROTA: You, too.

SHOW: AUSTRALIAN BROADCASTING SYSTEM (ABC) 7.30 8:05 PM AEST ABC

January 6, 2015 Tuesday

LENGTH: 942 words

HEADLINE: Prince Andrew under pressure as Palace disputes teen sex scandal claims

REPORTERS: Philip Williams

BODY:

LEIGH SALES, PRESENTER: It's been a few years since Britain's Royal Family has been embroiled in a serious scandal, but once again, Prince Andrew has stepped forward.

He's accused of having sex with an underage girl in sensational details aired in an American court case.

The young woman says she was forced to entertain the Duke at the behest of his friend, billionaire and convicted paedophile Jeffrey Epstein.

Prince Andrew's ex-wife, Sarah Ferguson, has leapt to his defence and Buckingham Palace is also strenuously denying the allegations.

But, as Europe correspondent Philip Williams reports, the claims have blown apart the always uneasy calm between the Palace and the British press.

PHILIP WILLIAMS, REPORTER: As fifth in line to the throne, whatever Prince Andrew does or says will never go unnoticed.

So when media reports about a lawsuit in the US emerged linking his name with underage sex, the long period of relative Royal calm was abruptly shattered.

This woman, [REDACTED], is believed to be the person named in court papers as "Jane Doe 3". In a newspaper interview she claims she was used for underage sex by American billionaire Jeffrey Epstein and says she was lent out to his rich and powerful friends, including Prince Andrew. It's claimed she had sex with him three times when she was 17 at Jeffrey Epstein's luxury Caribbean Island home and in New York and London, all denied by Prince Andrew.

VICTORIA MURPHY, UK MIRROR ROYAL CORRESPONDENT: If this doesn't go away quickly, if these allegations continue to be made, if more allegations are added, this could be incredibly damaging, not just for Andrew, but for the monarchy as a whole.

PHILIP WILLIAMS: It all seems a world away from the golden glow of recent Royal events - a wedding that cemented the popularity of Prince William and his bride. Followed of course by the arrival of baby Prince George. And for the Queen, a diamond jubilee, a celebration of 60 years on the throne, reason for her to smile as the nation and beyond said thanks for her never-ending job.

Over the weekend, that run of feel-good luck expired.

Normally with a story like this, Buckingham Palace would be more inclined to stay quiet, not to give any oxygen whatsoever to the sort of claims that have been made. But this time, it's very, very different. Not one, but two statements saying Prince Andrew is completely innocent of all the accusations.

VICTORIA MURPHY: They issued one statement initially in response to the allegations that Prince Andrew had had sex with an underage minor and that was what they were responding to and they were categorically denying that that had been the case. However, in doing that they had left the door open that perhaps he was only denying the fact that she was a minor and questions were being asked about that. So when more of her allegations surfaced, they decided that they needed to release an even stronger denial, categorically denying any sexual contact whatsoever.

PHILIP WILLIAMS: What isn't in dispute is that Prince Andrew and Jeffrey Epstein were good friends over a number of years.

In 2008, Mr Epstein was sentenced to 18 months' jail for soliciting an underage girl for the purposes of prostitution. That, after a controversial plea bargain. He remains a registered sex offender.

Yet in 2011, after his release, Prince Andrew was seen with his old friend in New York Central Park. That cost Prince Andrew an unpaid job he was said to have loved as the UK's Trade and Industry special representative, opening doors for British business overseas.

CHRIS BRYANT, LABOUR MP (March, 2011): But I'm afraid he's now just become a national embarrassment. And my worry is that sometimes when he goes on these trips, I'm not sure whether he's helping us out or he's just helping himself.

PHILIP WILLIAMS: For him, that door closed as a direct result of his association with Jeffrey Epstein.

VICTORIA MURPHY: People who know Prince Andrew have said that he is very loyal to his friends and that that is one of his strong points. However, I think that those closest to him now accept that that particular friendship and the loyalty to Jeffrey Epstein that continued until after he was convicted of paedophilia, I think people are now saying, you know, he accepts that that was a mistake. However, what is being said is that Andrew is only guilty of choosing his friends badly. He's not guilty of anything else.

PHILIP WILLIAMS: Prince Andrew isn't the only one named in the court documents, and while he isn't publicly defending himself, another of those accused certainly is.

Harvard Law Professor **Alan Dershowitz** has been doing the media rounds of the US and beyond. He denies even knowing his accuser, let alone having sex with her.

ALAN DERSHOWITZ, HARVARD LAW SCHOOL: My goal is to bring charges against the client and require her to speak in court. She - if she believes she has been hurt by me and by Prince Andrew, she should be suing us for damages. I welcome that lawsuit. I welcome any opportunity which would put her under oath and require her to state under oath these false allegations.

PHILIP WILLIAMS: Under the plea bargain struck with prosecutors by Jeffrey Epstein, it appears that other potential allegations may not end up tested in court and that could apply to possible co-conspirators, an arrangement alleged victims were not involved with.

Through Palace statements, the Duke of York has unequivocally denied any wrongdoing. He's not charged with anything, nor has he been questioned by police.

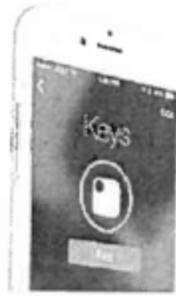
But the Queen's second son is in a spotlight he cannot wish away. His annus horribilis may have just begun.

LEIGH SALES: Philip Williams reporting from London.

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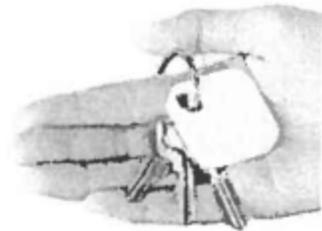
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Florida judge tosses 'sex slave' claims involving Prince Andrew, Alan Dershowitz

BY OREN YANIV, DAREH GREGORIAN / NEW YORK DAILY NEWS / Published: Tuesday, April 7, 2015, 12:49 PM / Updated: Tuesday, April 7, 2015, 3:11 PM

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Prince Andrew with [redacted], who claims Jeffrey Epstein made her a "sex slave."

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A Florida judge has tossed out explosive claims from a woman who said she was forced into having sex with England's Prince Andrew when she was a teenager.

In a ruling Tuesday, Judge Kenneth Marra denied a bid by "Jane Doe No. 3 and Jane Doe No. 4" to intervene in a long-running court case alleging the feds gave preferential treatment to billionaire perv Jeffrey Epstein.

Jane Doe No. 3 — whose identity has been revealed as [redacted], 31 — said in a bombshell court filing that Epstein turned her into a "sex slave" for him and his rich and famous pals when she was just 15.

Among those she said she was pushed into having relations were Prince Andrew — known in the British press as "Randy Andy" — and famed defense lawyer Alan Dershowitz.



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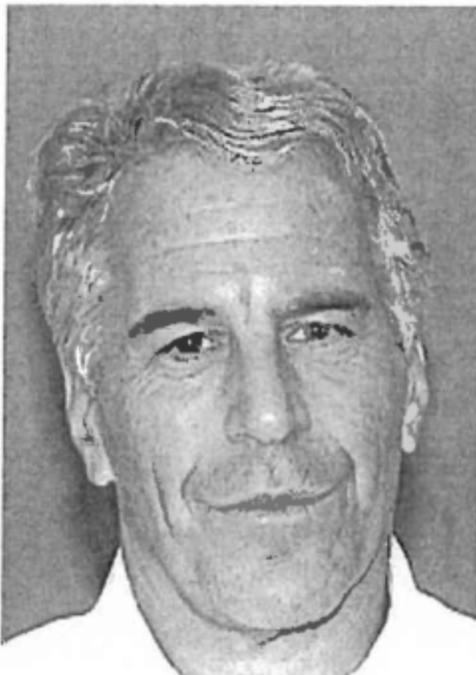




Prince Andrew is seen leaving Verbier ski resort in Switzerland in January amid the brewing sex scandal.

Dershowitz called the claims a libelous smear, and asked Marra to throw out the "outrageous and impertinent allegations."

In his ruling, the judge said the court "has considered Mr. Dershowitz's arguments, but it finds that his intervention is unnecessary" — as were Jane Doe No. 3's "lurid details."



The "sex slave" claims made in the Jeffrey Epstein case against the feds have been tossed by a Florida judge.

In an affidavit, Roberts detailed her alleged trysts with Dershowitz and others, including a wild orgy with Andrew, Epstein, and other apparently underage girls

"The factual details regarding with whom and where the Jane Does engaged in sexual activities are immaterial and impertinent to this central claim... especially considering that these details involve non-parties who are not related to the respondent Government. These unnecessary details shall be stricken," the judge wrote.

He also found there was no reason for the new Does to intervene in the case at all, since the original two plaintiffs had filed suit on behalf of all of Epstein's victims six years ago.

"The Court finds that justice does not require adding new parties this late in the proceedings," the judge wrote, and "it is entirely unnecessary

for Jane Doe 3 and Jane Doe 4 to proceed as parties in this action."

The judge did say the women could be called as witnesses when the case goes to trial.

"The necessary 'participation' of Jane Doe 3 and Jane Doe 4 in this case can be satisfied by offering their properly supported — and relevant, admissible, and non-cumulative — testimony as needed," Marra wrote.



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ANDREW HERRIARD/REUTERS

Alan Dershowitz was pleased to hear the judge throw out the "sex slave" allegations and says he will be vindicated.

Dershowitz told the Daily News he's pleased with the decision — but he still plans on going after [redacted] and her lawyers for defamation.

"She was hiding in Colorado ... but we found her and she will have to be deposed," he said. "The end result is that she'll go to jail because she will repeat her lies and we'll be able to prove it and she will end up in prison for perjury."

As for his own reputation: "I'm confident that at the end I'll be vindicated and everybody will understand this is a completely made up story."

Buckingham Palace has denied the allegations against Prince Andrew, which had been bolstered by a picture of the prince with his arm wrapped around [redacted] waist.

A palace spokesman declined to comment on the judge's ruling to The Associated Press.

A lawyer for the four Does, Brad Edwards, vowed to press on with the fight for Epstein's victims, who the feds have acknowledged number in the dozens.

"We are pleased by the Court's ruling recognizing that Jane Doe 3 and 4 have a right to participate without the need for formal intervention," he said.

In a statement, "Doe 3" said, "I'm happy to get to participate in this important case."

(AGS: prince andrew , alan dershowitz)

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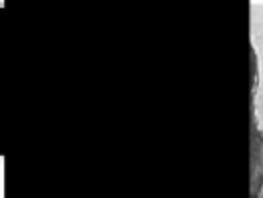
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Thursday 09 April, 2015

Published On: Wed, Apr 8th, 2015

Court / US / Canada | By Ilan Shavit

After Vindication, Alan Dershowitz Vows to Sue Sex Accuser in Court

Dershowitz he also planning to sue his accuser's attorneys for defamation.



Professor Alan Dershowitz told Newsmax he plans to sue the woman who accused him of sexual misconduct.

Dershowitz spoke after a federal judge on Tuesday U.S. District Court Judge Kenneth Marra had ordered said woman's allegations be removed from the record of an ongoing lawsuit against convicted billionaire pedophile Jeffrey Epstein.

Judge Marra denied a motion by "Jane Doe 3 and Jane Doe 4" to join the lawsuit. He also wrote that the "lurid details" ... "regarding with whom and where the Jane Does engaged in sexual activities are immaterial and impertinent to this central claim ... especially considering that these details involve non-parties who are not related to the respondent Government. These unnecessary details shall be stricken."

The two "non-parties" have been Prince Andrew and Alan Dershowitz.

“We’ve been legally vindicated but my reputation has still been, unfortunately, tarnished in the minds of at least some people by a woman who just lied and made up a story out of whole cloth,” Dershowitz told Newsmax’s Steve Malzberg.

“It was like a drive-by shooting or like somebody scribbling graffiti on a bathroom door,” Dershowitz said.

Read Latest Breaking News from Newsmax.com <http://www.newsmax.com/Newsfront/Alan-Dershowitz-Steve-Malzberg-sexual-misconduct-suing/2015/04/07/id/637044/#ixzz3WhkDlzTe>
Urgent: Rate Obama on His Job Performance. Vote Here Now!

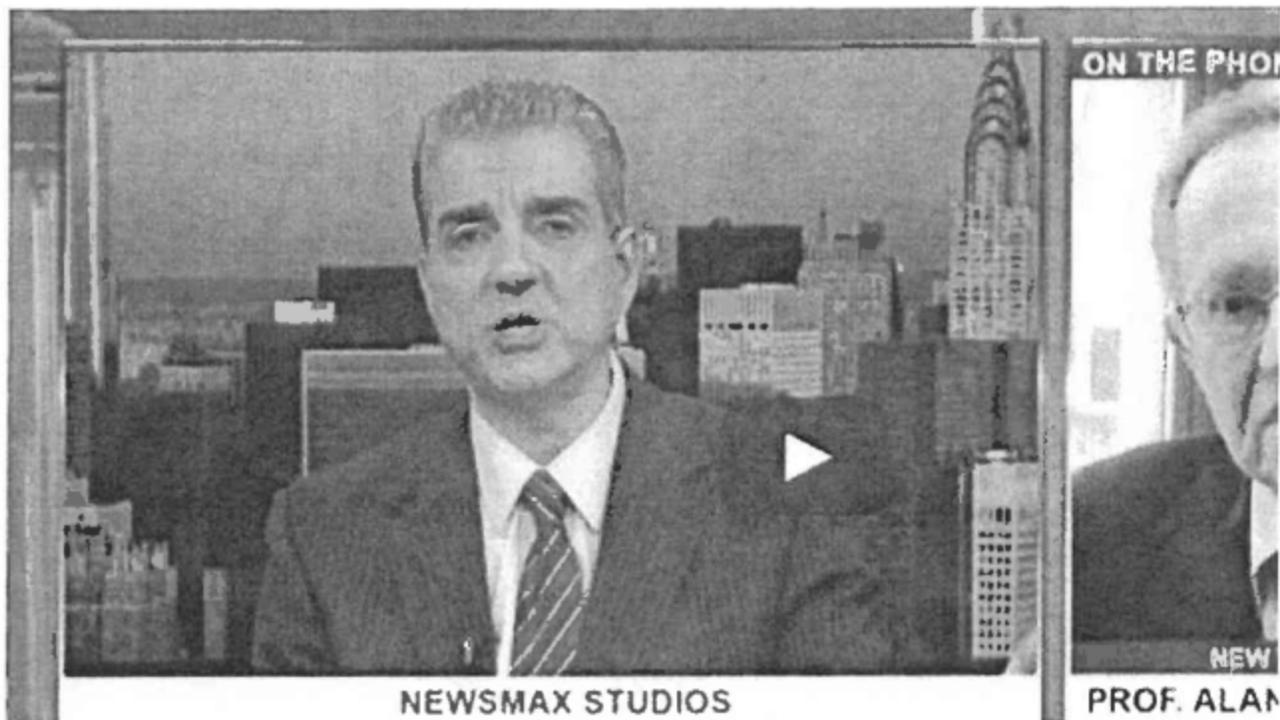
Dershowitz, who originally represented Epstein in his plea deal, said he will now seek to depose “Jane Doe 3.”

“We will persuade the world that she made up the whole story out of whole cloth,” he said.

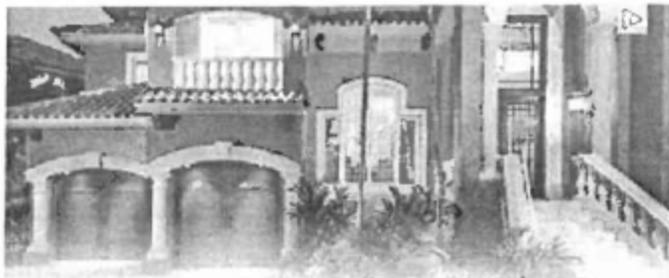
Dershowitz he also planning to sue his accuser’s attorneys for defamation.

“And we’re considering suing her for defamation as well, but right now she was trying to hide in Colorado and avoid service, but we found her and we served her and now she’ll be subjected to a deposition,” he said.

“And if she repeats what she said previously under oath, she will go to jail because what she said is a complete, total, made-up lie. Not only about me but about many other people.”



Read more about: [Alan Dershowitz](#), [Jane Doe 3](#), [Jeffrey Epstein](#), [Kenneth Marra](#)



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EXHIBIT 6

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

3/31/15
1:15

EJ

SIGRIA.M.

BRADLEY J. EDWARDS and
PAUL G. CASSELL,

Plaintiffs / Counterclaim Defendants,

v.

ALAN M. DERSHOWITZ,

Defendant / Counterclaim Plaintiff.

SUBPOENA DUCES TECUM

THE STATE OF FLORIDA:

**To: Records Custodian
Boies, Schiller & Flexner LLP
401 East Las Olas Blvd.
Suite 1200
Fort Lauderdale, FL 33301**

YOU ARE COMMANDED to produce the items described in Exhibit A which is attached to this subpoena for inspection and copying. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparing the copies.

You may mail or deliver the copies to the attorney whose name appears on this subpoena or you may appear with the items to be inspected and copied at the offices of Cole, Scott & Kissane, 9150 South Dadeland Boulevard, Suite 1400, Miami, Florida 33156, on or before April 15, 2015.

You have the right to object to the production pursuant to this subpoena at any time before production by giving notice to the attorney whose name appears on this subpoena. If you fail to appear, you may be in contempt of Court.

You are subpoenaed to appear by the following attorney, and unless from this subpoena by this attorney or the Court, you shall respond to this subpoena as directed.

THIS 27th DAY OF March, 2015.

By: s/Thomas E. Scott
THOMAS E. SCOTT
For the Court

Thomas E. Scott
Florida Bar No. 149100

[REDACTED]
Steven R. Safra
Florida Bar No. 057028

[REDACTED]
COLE, SCOTT & KISSANE, P.A.
Cole, Scott & Kissane Building, Suite 1400
9150 South Dadeland Boulevard
Miami, Florida 33156
Phone: [REDACTED]
Fax: [REDACTED]

Richard A. Simpson (admitted pro hac vice)

[REDACTED]
Mary E. Borja (admitted pro hac vice)

[REDACTED]
Ashley E. Eiler (pro hac vice pending)

[REDACTED]
WILEY REIN LLP
1776 K Street NW
Washington, DC 20006
Phone: [REDACTED]
Fax: [REDACTED]

Counsel for Alan M. Dershowitz

GENERAL INSTRUCTIONS

1. This subpoena is directed to You and covers all information in Your possession and all information subject to Your custody or control, wherever they may be located.
2. Each request in this subpoena is to be responded to separately and as thoroughly as possible. The fact that investigation is continuing shall not be used as an excuse for failure to respond to each request as fully as possible. The omission of any document, thing or item of information shall be deemed a representation that such document is not known to You, your counsel, or other representatives at the time of the service of the response.
3. If the attorney/client privilege or a work product protection is asserted in response to any production request, identify the document by its:
 - (a) date;
 - (b) general nature, *e.g.* letter, memorandum, photograph, computer printout, etc.;
 - (c) subject matter;
 - (d) author or originator;
 - (e) each person indicated as an addressee or copy recipient, or known or believed by you to have received a copy of the document;
 - (f) present custodian of each copy of the document;
 - (g) alleged ground or grounds for withholding production; and
 - (h) sufficient particulars to allow Dershowitz to evaluate the claim of privilege or immunity asserted.

DEFINITIONS

As used in this subpoena, the following definitions shall apply:

1. "All" and "Each" mean all, each, any, and every.
2. "Concerning" and "Concern" mean relates to, refers to, contains, describes, embodies, mentions, constitutes, constituting, supports, corroborates, demonstrates, proves, evidences, shows, refutes, disputes, rebuts, controverts, undercuts and contradicts.
3. "Dershowitz" means Alan M. Dershowitz.
4. "Document(s)" means any and All written, typed, printed, recorded or graphic matter, however produced, reproduced or stored, whether an original or a copy, and whether

prepared, published or released by any person or entity, including but not limited to letters, reports, agreements, correspondence, intra-office or inter-office correspondence, telegrams, minutes or records of meetings, reports or summaries, expressions or statements, lists, drafts and revisions, invoices, receipts, original and preliminary notes, sketches, records, ledgers, contracts, bills of lading, bills, inventories, financial data, maps, memoranda, accounting and financial records, diaries, journals, calendars, statements, work papers, videotapes, photographs, pamphlets, brochures, advertisements, trade letters, press releases, drawings, recaps, tables, articles, summaries of conversations, computer cards, tapes, diskettes, or other means of electronically or magnetically maintaining information, and printouts.

The term "Document(s)" also includes electronically stored data from which information can be obtained either directly or by translation through detection devices or readers; any such document is to be produced in a reasonably legible and usable form. The term "Document(s)" includes All drafts of a Document and All copies that differ in any respect from the original, including any notation, underlining, marking, or information not on the original. The term also includes information stored in, or accessible through, computer or other information retrieval systems (including any computer archives or back-up systems), together with instructions and All other materials necessary to use or interpret such data compilations.

Without limitation on the term "control" as used in the preceding paragraph, a Document is deemed to be in Your control if You have the right to secure the Document or a copy thereof from another person.

5. "Epstein" means Jeffrey Epstein.
6. "Federal Action" means the matter styled *Jane Doe #1, et al. v. United States of America*, Case No. 08-80736-CIV-MARRA/JOHNSON (S.D. Fla.).
7. "Jane Doe # 3" means the individual referred to as "Jane Doe #3" in the Federal Action.
8. "You" and "Your" means the entity to whom this subpoena is addressed, including the Entity's members, employees, past employees, accountants, agents, attorneys, representatives, and all other persons acting or purporting to act on its behalf.

EXHIBIT "A"

1. All Documents Concerning any actual or potential book, television or movie contracts or deals concerning Jane Doe #3's allegations about being a sex slave.
2. All Documents Concerning any monetary payments or other consideration received by Jane Doe #3 from any media outlet in exchange for her statements (whether "on the record" or "off the record") regarding Epstein, Dershowitz, Prince Andrew, Duke of York, and/or being a sex slave.
3. All Documents that reference Dershowitz by name, which support and/or confirm the allegations set forth in Paragraphs 24-31 of Jane Doe #3's Declaration dated January 19, 2015 (Docket Entry #291-1) and/or Paragraph 49 of Jane Doe #3's Declaration dated February 5, 2015 (Docket Entry #310-1), which were filed in the Federal Action.
4. All photographs and video in the original, native format in which they were taken (not a paper copy) of Jane Doe #3 with Dershowitz.
5. All photographs and video in the original, native format in which they were taken (not a paper copy) not produced in response to Request No. 4, above, of Dershowitz at (i) Epstein's Manhattan home in New York City, New York; (ii) Epstein's home in Palm Beach, Florida; (iii) Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Epstein's airplane, on the same date and time that Jane Doe #3 were also present at such location.
6. Any documents and information that support and/or confirm Jane Doe #3's presence at the various locations named in Paragraphs 24-31 of Jane Doe #3's January 19, 2015 Declaration in the Federal Action on the particular dates and times when Dershowitz was also present.
7. Any documents and information that show Dershowitz was present at the various locations named in Paragraphs 24-31 of Jane Doe #3's January 19, 2015 Declaration in the Federal Action on the particular dates and times when Jane Doe #3 alleges to have been present.
8. All statements, written or recorded, that Jane Doe #3 has provided to anyone that reference Dershowitz by name or other description.
9. All notes of, or notes prepared for, any statements or interviews in which Jane Doe #3 referenced Dershowitz by name or other description.
10. All Documents Concerning any communications by Jane Doe #3 or on Jane Doe #3's behalf with any media outlet concerning Dershowitz or the Federal Action, whether or not such communications were "on the record" or "off the record."
11. All notes, writings, photographs, and/or audio or video recordings made or recorded by or of Jane Doe #3 on the dates on which Jane Doe #3 alleges she was present with Dershowitz, including but not limited to Jane Doe #3's calendar, diary or journal entries

on those dates, regardless whether the notes, writings, photographs, and/or audio or video recordings refer to Dershowitz. To the extent that any responsive materials are photographs or video recordings, please provide them in the original, native format in which they were taken (not a paper copy).

12. All Documents Concerning Jane Doe #3's travel to or from locations for those occasions when she alleges she was present with Dershowitz.
13. To the extent not produced in response to the above list of requested Documents, all notes, writings, photographs, and/or audio or video recordings made at any time that refer or relate in any way to Dershowitz.
14. All drafts of declarations or affidavits by Jane Doe #3 that relate in any way to Dershowitz and/or Epstein.
15. All Documents Concerning any telephone, including any cellular telephone, used by Jane Doe #3 between January 1, 1999 and December 31, 2002.
16. Any diary, journal or calendar Concerning Jane Doe #3's activities between January 1, 1999 and December 31, 2002.
17. All Documents Concerning Jane Doe #3's presence at or on (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane from January 1, 1999 through December 31, 2002.
18. All travel records of any kind, including but not limited to tickets, hotel room receipts or other documents Concerning any travel undertaken by Jane Doe #3 between January 1, 1999 and December 31, 2002.
19. All records of any interviews given by Jane Doe #3 to any party Concerning Dershowitz, Epstein, or any of their agents or associates.
20. All manuscripts and/or other writings, whether published or unpublished, created in whole or in part by Jane Doe #3, Concerning Epstein and any of his agents or associates.
21. All Documents Concerning Jane Doe #3's allegations that she met former President Bill Clinton, former Vice President Al Gore and/or Mary Elizabeth "Tipper" Gore on Little Saint James island in the U.S. Virgin Islands.
22. All Documents Concerning your retention by Jane Doe #3, including, but not limited to: signed letter of retainer, retention agreement, explanation of fees and/or any document describing the scope of retention.

23. All Documents which are related to when Jane Doe #3 allegedly told her attorneys that Alan Dershowitz was among the men she had sexual relations with.

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT IN AND
FOR BROWARD COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and
PAUL G. CASSELL,

Plaintiffs/Counterclaim Defendants,

vs.

ALAN M. DERSHOWITZ,

Defendant/Counterclaim Plaintiff.

CERTIFICATE OF NON OBJECTION

Defendant ALAN M. DERSHOWITZ ("Defendant"), by and through his undersigned counsel, hereby files this certificate that no objections were received to the subpoena duces tecum directed to Boies, Schiller & Flexner, LLP.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-mail on **March 27, 2015** to: Jack Scarola, Esquire, Searcy Denny et al [REDACTED] and [REDACTED] counsel for Plaintiff.

COLE, SCOTT & KISSANE, P.A.
Cole, Scott & Kissane Building, Suite 1400
9150 South Dadeland Blvd.
Miami, Florida 33156
P: [REDACTED]
F: [REDACTED]

By: /s/ Thomas Scott
THOMAS E. SCOTT
FBN: 149100
STEVEN R. SAFRA
FBN: 057028
E-Mail: thomas.scott@csklegal.com
E-Mail: [REDACTED]
Secondary E-mail: renee.nail@csklegal.com
Secondary E-mail: [REDACTED]

Richard A. Simpson (admitted pro hac vice)

[REDACTED]

Mary E. Borja (admitted pro hac vice)

[REDACTED]

Ashley E. Eiler (pro hac vice pending)

[REDACTED]

WILEY REIN LLP

1776 K Street NW

Washington, DC 20006

Phone: [REDACTED]

Fax: [REDACTED]

Counsel for Alan M. Dershowitz

EXHIBIT 7

District Court Fremont County, Colorado Court Address: 136 Justice Center Rd Canon City, CO 81212	▲ COURT USE ONLY ▲
Plaintiff(s)/Petitioner(s): Edwards, et al. v. Defendant(s)/Respondent(s): Dershowitz	
SUBPOENA TO <input type="checkbox"/> ATTEND <input checked="" type="checkbox"/> ATTEND AND PRODUCE	

To [REDACTED]

You are ordered to attend and give testimony at the District Court of Fremont County, located at: 136 Justice Center Road, Canon City, CO 81212, Room #105, on Tuesday, May 12, 2015, at 9:30 a.m. as a witness for the Plaintiff(s)/Petitioner(s) Defendant(s)/Respondent(s) in this action.

At that time and place, you also shall produce the following items now in your custody or control:

See attached Schedule A

Names, addresses and telephone numbers of all counsel of record in this action and of any party represented by counsel are as follows.

Name	Address	Telephone Number
For Plaintiffs Bradley J. Edwards and Paul G. Cassell Jack Scarola, FL Bar No. 169440 Searcy Denney Scarola Barnhart & Shipley, PA	2139 Palm Beach Lakes Blvd. West Palm Beach, FL 33409	[REDACTED]
For Defendant Alan M. Dershowitz Thomas E. Scott, Florida Bar No. 149100 Steven R. Safra, Florida Bar No. 057028 Cole, Scott & Kissane, PA	9150 South Dadeland Blvd., #1400 Miami, FL 33156	[REDACTED]

Date: March 30, 2015

[Signature]
Clerk/Deputy Clerk or Attorney

AFFIDAVIT OF SERVICE

I, _____, do hereby certify that _____ and not a party to the action are the persons named in the Subpoena to

_____ (State)

I have personally served the Subpoena on the person named in the Subpoena as the Witness or by leaving it with the person named in the Subpoena.

I have personally served the Subpoena on _____ occasions but have not been able to locate the Witness.

I have personally served the Subpoena on _____ County

Signature of Process Server

Name (Print or type)

Notary Public /Deputy Clerk Date

SCHEDULE "A"

1. All documents that reference by name, Alan M. Dershowitz,¹ which support and/or confirm the allegations set forth in Paragraphs 24-31 of your Declaration dated January 19, 2015 and/or Paragraph 49 of your Declaration dated February 5, 2015, which were filed with the United States District Court for the Southern District of Florida, in Jane Doe #1 and Jane Doe #2 v. United States of America, Case No. 08-80736-CIV-MARRA/JOHNSON, [ECF No. 291-1] (the "Federal Action").
2. All photographs and video in the original, native format in which they were taken (not a paper copy) of you with Alan M. Dershowitz.
3. All photographs and video in the original, native format in which they were taken (not a paper copy) not produced in response to Request No. 2, above, of Alan M. Dershowitz at (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane, on the same date and time that you were also present at such location.
4. All photographs and video in the original, native format in which they were taken (not a paper copy) of you not produced in response to Request No. 3, above, that evidence and/or show you were present at the same location as Alan M. Dershowitz on that same date and time.
5. Any documents and information that support and/or confirm your presence at the various locations named in Paragraphs 24-31 of your Declaration on the particular dates and times when Alan M. Dershowitz was also present.
6. Any documents and information that show Alan M. Dershowitz was present at the various locations named in Paragraphs 24-31 of your Declaration on the particular dates and times when you allege to have been present in your response to Request No. 5, above.
7. All statements, written or recorded, which you have provided to anyone that reference by name, Alan M. Dershowitz.
8. All notes of, or notes prepared for, any statements or interviews in which you referenced by name or other description, Alan M. Dershowitz.
9. All documents concerning any communications by you or on your behalf with any media outlet concerning Alan M. Dershowitz or the Federal Action, whether or not such communications were "on the record" or "off the record."
10. All notes, writings, photographs, and/or audio or video recordings made or recorded by or of you on the dates on which you allege you were present with Alan M. Dershowitz, including but not limited to your calendar, diary or journal entries on those dates, regardless whether the notes, writings, photographs, and/or audio or video recordings refer to Mr. Dershowitz. To the extent

¹ For purposes of this Schedule "A", reference to "Alan M. Dershowitz" herein shall mean and refer to any reference to the Defendant in this action, including but not limited to, as "Alan", "Alan M. Dershowitz", "Professor Dershowitz", or "Dershowitz", and the like.

that any responsive materials are photographs or video recordings, please provide them in the original, native format in which they were taken (not a paper copy).

12. All documents relating to your travel to or from locations for those occasions when you allege you were present with Alan M. Dershowitz.
13. To the extent not produced in response to the above list of requested documents, all notes, writings, photographs, and/or audio or video recordings made at any time that refer or relate in any way to Alan M. Dershowitz.
14. All drafts of declarations or affidavits by you that relate in any way to Alan M. Dershowitz and/or Jeffrey Epstein.
15. All documents relating to any telephone, including any cellular telephone, used by you between January 1, 1999 and December 31, 2002.
16. Any diary, journal or calendar concerning your activities between January 1, 1999 and December 31, 2002.
17. All documents concerning any actual or potential book, television or movie deals concerning your allegations about being a sex slave.
18. All documents concerning any monetary payments or other consideration received by you from any media outlet in exchange for your statements (whether "on the record" or "off the record") regarding Jeffrey Epstein, Alan M. Dershowitz, Prince Andrew, Duke of York, and/or being a sex slave.
19. All documents showing, concerning, relating or referring to when you were at or on (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane from January 1, 1999 through December 31, 2002.
20. All documents showing any payments or remuneration of any kind made by Jeffrey Epstein or any of his agents or associates to you from January 1, 1999 through December 31, 2002.
21. All travel records of any kind, including but not limited to tickets, hotel room receipts or other documents concerning, relating or referring to any travel undertaken by you between January 1, 1999 and December 31, 2002.
22. All records of any interviews given by you to any party concerning, relating or referring to Jeffrey Epstein or any of his agents or associates.
23. All manuscripts and/or other writings, whether published or unpublished, created in whole or in part by you, concerning, relating or referring to Jeffrey Epstein and any of his agents or associates.
24. All documents concerning, relating or referring to your assertions that you met former President Bill Clinton, former Vice President Al Gore and/or Mary Elizabeth "Tipper" Gore on Little Saint James island in the U.S. Virgin Islands.

25. All documents concerning your retention of the law firm Boies, Schiller & Flexner LLP, including but not limited to: signed letter of retainer, retention agreement, explanation of fees, and/or any documents describing the scope of retention.

District Court Fremont County, Colorado Court Address: 136 Justice Center Rd Canon City, CO 81212	DATE FILED: March 26, 2015 CASE NUMBER: 2015CV80051 DATE FILED: MARCH 26 2015 2:20 PM
Plaintiff(s)/Petitioner(s): Edwards, et al. v. Defendant(s)/Respondent(s): Dershowitz	COURT USE ONLY Case Number: 15CV30051 Division: 97 Courtroom: 1015
SUBPOENA TO <input type="checkbox"/> ATTEND <input checked="" type="checkbox"/> ATTEND AND PRODUCE	

To: Jane Doe #3 (address redacted for purpose of court filing)

You are ordered to attend and give testimony at the District Court of Fremont County, located at: 136 Justice Center Road, Canon City, CO 81212, Room # 105, on Tuesday, May 12, 2015, at 9:30 a.m. as a witness for the Plaintiff(s)/Petitioner(s) Defendant(s)/Respondent(s) in this action.

At that time and place, you also shall produce the following items now in your custody or control:

See attached Schedule A

Names, addresses and telephone numbers of all counsel of record in this action and of any party represented by counsel are as follows:

Name	Address	Telephone Number
For Plaintiffs Bradley J. Edwards and Paul G. Cassell Jack Scarola, FL Bar No. 169440 Searcy Denney Scarola Barnhart & Shipley, PA	2139 Palm Beach Lakes Blvd. West Palm Beach, FL 33409	[REDACTED]
For Defendant Alan M. Dershowitz Thomas E. Scott, Florida Bar No. 149100 Steven R. Safra, Florida Bar No. 057028 Cole, Scott & Kissane, PA	9150 South Dadeland Blvd., #1400 Miami, FL 33156	[REDACTED]

DEBORAH SATHER STRINGARI
CLERK OF THE COMBINED COURTS

Date: March 26, 2015

Deborah Sather Stringari
Clerk/Deputy Clerk of Attorney



AFFIDAVIT OF SERVICE

I declare under oath that, I am 18 years or older and not a party to the action and that I served this Subpoena to

Attend Attend and Produce to the Witness in _____ (County) _____ (State)

on _____ (date) at the following location: _____

Check one:

By handing it to a person identified to me as the Witness or by leaving it with the Witness who refused service.

I attempted to serve the Witness on _____ occasions but have not been able to locate the Witness.

Private process server

Sheriff, _____ County

Fee \$ _____ Mileage \$ _____

Signature of Process Server

Name (Print or type)

My Commission Expires: _____

Notary Public /Deputy Clerk Date

SCHEDULE "A"

1. All documents that reference by name, Alan M. Dershowitz,¹ which support and/or confirm the allegations set forth in Paragraphs 24-31 of your Declaration dated January 19, 2015 and/or Paragraph 49 of your Declaration dated February 5, 2015, which were filed with the United States District Court for the Southern District of Florida, in Jane Doe #1 and Jane Doe #2 v. United States of America, Case No. 08-80736-CIV-MARRA/JOHNSON, [ECF No. 291-1] (the "Federal Action").
2. All photographs and video in the original, native format in which they were taken (not a paper copy) of you with Alan M. Dershowitz.
3. All photographs and video in the original, native format in which they were taken (not a paper copy) not produced in response to Request No. 2, above, of Alan M. Dershowitz at (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane, on the same date and time that you were also present at such location.
4. All photographs and video in the original, native format in which they were taken (not a paper copy) of you not produced in response to Request No. 3, above, that evidence and/or show you were present at the same location as Alan M. Dershowitz on that same date and time.
5. Any documents and information that support and/or confirm your presence at the various locations named in Paragraphs 24-31 of your Declaration on the particular dates and times when Alan M. Dershowitz was also present.
6. Any documents and information that show Alan M. Dershowitz was present at the various locations named in Paragraphs 24-31 of your Declaration on the particular dates and times when you allege to have been present in your response to Request No. 5, above.
7. All statements, written or recorded, which you have provided to anyone that reference by name, Alan M. Dershowitz.
8. All notes of, or notes prepared for, any statements or interviews in which you referenced by name or other description, Alan M. Dershowitz.
9. All documents concerning any communications by you or on your behalf with any media outlet concerning Alan M. Dershowitz or the Federal Action, whether or not such communications were "on the record" or "off the record."

¹ For purposes of this Schedule "A", reference to "Alan M. Dershowitz" herein shall mean and refer to any reference to the Defendant in this action, including but not limited to, as "Alan", "Alan M. Dershowitz", "Professor Dershowitz", or "Dershowitz", and the like.

10. All notes, writings, photographs, and/or audio or video recordings made or recorded by or of you on the dates on which you allege you were present with Alan M. Dershowitz, including but not limited to your calendar, diary or journal entries on those dates, regardless whether the notes, writings, photographs, and/or audio or video recordings refer to Mr. Dershowitz. To the extent that any responsive materials are photographs or video recordings, please provide them in the original, native format in which they were taken (not a paper copy).
12. All documents relating to your travel to or from locations for those occasions when you allege you were present with Alan M. Dershowitz.
13. To the extent not produced in response to the above list of requested documents, all notes, writings, photographs, and/or audio or video recordings made at any time that refer or relate in any way to Alan M. Dershowitz.
14. All drafts of declarations or affidavits by you that relate in any way to Alan M. Dershowitz and/or Jeffrey Epstein.
15. All documents relating to any telephone, including any cellular telephone, used by you between January 1, 1999 and December 31, 2002.
16. Any diary, journal or calendar concerning your activities between January 1, 1999 and December 31, 2002.
17. All documents concerning any actual or potential book, television or movie deals concerning your allegations about being a sex slave.
18. All documents concerning any monetary payments or other consideration received by you from any media outlet in exchange for your statements (whether "on the record" or "off the record") regarding Jeffrey Epstein, Alan M. Dershowitz, Prince Andrew, Duke of York, and/or being a sex slave.
19. All documents showing, concerning, relating or referring to when you were at or on (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane from January 1, 1999 through December 31, 2002.
20. All documents showing any payments or remuneration of any kind made by Jeffrey Epstein or any of his agents or associates to you from January 1, 1999 through December 31, 2002.
21. All travel records of any kind, including but not limited to tickets, hotel room receipts or other documents concerning, relating or referring to any travel undertaken by you between January 1, 1999 and December 31, 2002.

22. All records of any interviews given by you to any party concerning, relating or referring to Jeffrey Epstein or any of his agents or associates.
23. All manuscripts and/or other writings, whether published or unpublished, created in whole or in part by you, concerning, relating or referring to Jeffrey Epstein and any of his agents or associates.
24. All documents concerning, relating or referring to your assertions that you met former President Bill Clinton, former Vice President Al Gore and/or Mary Elizabeth "Tipper" Gore on Little Saint James island in the U.S. Virgin Islands.
25. All documents concerning your retention of the law firm Boies, Schiller & Flexner LLP, including but not limited to: signed letter of retainer, retention agreement, explanation of fees, and/or any documents describing the scope of retention.

ATTACHMENT A

C.R.C.P. 45 requires the party issuing a subpoena for the production of records or a tangible thing to provide the following information:

(c) Protecting a Person Subject to a Subpoena.

(1) **Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction, which may include lost earnings and reasonable attorney's fees, on a party or attorney who fails to comply.

(2) Command to Produce Records or Tangible Things.

(A) **Attendance not required.** A person commanded to produce records or tangible things need not attend in person at the place of production unless also commanded to attend for a deposition, hearing, or trial.

(B) For production of privileged records.

(I) If a subpoena commands production of records from a person who provides services subject to one of the privileges established by C.R.S. § 13-90-107, or from the records custodian for that person, which records pertain to services performed by or at the direction of that person ("privileged records"), such a subpoena must be accompanied by an authorization signed by the privilege holder or holders or by a court order authorizing production of such records.

(II) Prior to the entry of an order for a subpoena to obtain the privileged records, the court shall consider the rights of the privilege holder or holders in such privileged records, including an appropriate means of notice to the privilege holder or holders or whether any objection to production may be resolved by redaction.

(III) If a subpoena for privileged records does not include a signed authorization or court order permitting the privileged records to be produced by means of subpoena, the subpoenaed person shall not appear to testify and shall not disclose any of the privileged records to the party who issued the subpoena.

(C) **Objections.** Any party or the person subpoenaed to produce records or tangible things may submit to the party issuing the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials. The objection must be submitted before the earlier of the time specified for compliance or 14 days after the subpoena is served. If objection is made, the party issuing the subpoena shall promptly serve a copy of the objection on all other parties. If an objection is made, the party issuing the subpoena is not entitled to inspect, copy, test or sample the materials except pursuant to an order of the court from which the subpoena was issued. If an objection is made, at any time on notice to the subpoenaed person and the other parties, the party issuing the subpoena may move the issuing court for an order compelling production.

(3) Quashing or Modifying a Subpoena.

(A) When required. On motion made promptly and in any event at or before the time specified in the subpoena for compliance, the issuing court must quash or modify a subpoena that:

(I) Fails to allow a reasonable time to comply;

(II) Requires a person who is neither a party nor a party's officer to attend a deposition in any county other than where the person resides or is employed or transacts his business in person, or at such other convenient place as is fixed by an order of court;

(III) Requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(IV) Subjects a person to undue burden.

(B) When permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion made promptly and in any event at or before the time specified in the subpoena for compliance, quash or modify the subpoena if it requires:

(I) Disclosing a trade secret or other confidential, research, development, or commercial information; or

(II) Disclosing an unretained expert's opinion or information that does not describe specific matters in dispute and results from the expert's study that was not requested by a party.

(C) Specifying conditions as an alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order attendance or production under specified conditions if the issuing party:

(I) Shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(II) Ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to Subpoena.

(1) Producing Records or Tangible Things.

(A) Unless agreed in writing by all parties, the privilege holder or holders and the person subpoenaed, production shall not be made until at least 14 days after service of the subpoena, except that, in the case of an expedited hearing pursuant to these rules or any statute, in the absence of such agreement, production shall be made only at the place, date and time for compliance set forth in the subpoena; and

(B) If not objected to, a person responding to a subpoena to produce records or tangible things must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand and must permit inspection, copying, testing, or sampling of the materials.

(2) Claiming Privilege or Protection.

(A) Information withheld. Unless the subpoena is subject to subsection (c)(2)(B) of this rule relating to production of privileged records, a person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(I) Make the claim expressly; and

(II) Describe the nature of the withheld records or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

EXHIBIT 8

IN THE CIRCUIT COURT OF THE
17TH JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO: CACE 15-000072

BRADLEY J. EDWARDS and
PAUL G. CASSELL,
Plaintiffs/Counterclaim Defendants

v.

ALAN DERSHOWITZ,
Defendant/Counterclaim Plaintiff

**NON-PARTY BOIES, SCHILLER AND FLEXNER LLP'S OBJECTIONS
TO ALAN DERSHOWITZ'S SUBPOENA DUCES TECUM**

The law firm of Boies, Schiller and Flexner LLP, a non-party to this action, pursuant to Fla. R. Civ. P. 1.410(e)(1), hereby objects to the Subpoena *Duces Tecum* noticed by Defendant Alan Dershowitz in its entirety and submits these responses and objections ("Responses") to the document requests ("Requests") contained therein.

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

Defendant, Alan Dershowitz has served the law firm of Boies, Schiller and Flexner LLP ("BSF") with a subpoena *duces tecum* seeking an array of documents that are both irrelevant to this matter and entirely privileged. Specifically, the subpoena seeks documents and communications between BSF and its client, Jane Doe 3, which are protected by the attorney-client privilege and work product doctrine. Notably, the face of the subpoena demonstrates that Defendant is not even seeking documents relevant to the matter before this Court and is, instead, attempting to obtain backdoor discovery for other actions including a federal action for which

BSF is also a non-party as explained more fully in BSF's Motion to Quash Defendant's Subpoena. Defendant's subpoena on BSF is solely meant to harass and place an undue burden on this law firm for its representation of non-party, Jane Doe 3. Defendant has made very public his disdain for Jane Doe 3, who was a victim of sexual trafficking, including calling her in the media a "prostitute," a "bad mother" and someone that he is determined to send to "jail." Defendant stated, "The end result of this case should be *she [Jane Doe No. 3] should go to jail*, the lawyers should be disbarred and everybody should understand that I am completely and totally innocent." (emphasis added). See Exhibit 1, CNN International, New Day, January 6, 2015. "My goal is to bring charges against the client and require her to speak in court." (emphasis added). See Exhibit 2, Australian Broadcasting System (ABC), January 6, 2015. "She was hiding in Colorado...but we found her and she will have to be deposed. *The end result is that she'll go to jail* because she will repeat her lies and we'll be able to prove it *and she will end up in prison* for perjury." (emphasis added). See also Exhibit 3, New York Daily News, April 7, 2015. As part of his harassment campaign, Defendant served a subpoena (which is a virtual duplicate to the subpoena he served on Jane Doe No. 3) on BSF simply to force this non-party law firm to engage in unnecessary work in having to respond to the disingenuous subpoena. Any appropriate and relevant document Requests should properly be directed to Jane Doe No. 3 and the subpoena to BSF should be quashed in its entirety. Accordingly, BSF has filed a Motion to Quash this Subpoena.

BSF's Responses are subject to the following qualifications, explanations and objections which apply to each and every Request and are incorporated in full by this reference into each and every Response below as if fully set forth therein:

1. BSF responds to the Requests as the firm reasonably interprets and understands the Requests. Should Defendant subsequently assert an interpretation of any individual Request that differs from BSF's understanding, BSF reserves the right to supplement the Responses.

2. To the extent a Request seeks documents protected from discovery by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection, no such documents shall be produced even if no specific objection is asserted in response to each individual request. Inadvertent identification or production of privileged documents or information is not a waiver of any applicable privilege.

3. BSF objects to the Definitions and Instructions and to each Request to the extent they seek to alter or expand upon the obligations imposed by the Florida Rules of Civil Procedure or the Local Rules. For example, BSF objects to Instruction no. 3 in that it seeks to impose an obligation for the production of a privilege log on a non-party in response to a subpoena duces tecum when no such log is required under Florida law. *See West Co., Inc. v. Scott Lewis' Gardening & Trimming, Inc.*, 24 So. 3d 620, 623 (Fla. 4th DCA 2009) (a privilege log is not required from a non-party).

4. BSF objects to the Definitions and Instructions and to each Request to the extent that it calls for the production of documents that are not in the firm's custody, possession, or control. BSF specifically objects to any Request that seeks documents that are in the possession, custody and control of any client of BSF.

5. A statement in response to a specific Request that BSF will produce documents is not a statement that any such documents exist but, rather, means only that such documents that do exist and are responsive to a specific Request will be produced.

6. To the extent that BSF produces documents in response to specific Requests to which the firm has objected, the firm reserves the right to maintain such objections with respect to any additional information and such objections are not waived by the production of responsive documents.

7. BSF objects to the Requests to the extent they seek private and confidential financial information or other confidential information of any kind.

8. BSF objects to the Requests to the extent they seek personal and confidential financial information related to third-parties.

9. BSF objects to the Requests to the extent that they seek documents already in defendant's possession or to the extent they are publicly available.

10. BSF objects to the Requests as overbroad as no time limit has been specified for any of the Requests. To the extent the Court directs discovery from this non-party, it should be limited to the date of the filing of this action on January 6, 2015 to the present.

11. BSF objects to the Requests as they seek to place an undue burden on a law firm handling the representation of a client who is a non-party to the pending litigation.

12. BSF objects to the Requests as they are duplicative of the subpoena Request served on BSF's Client, Jane Doe No. 3.

RESPONSES AND OBJECTIONS

1. All Documents concerning any actual or potential book, television or movie contracts or deals concerning Jane Doe #3's allegations about being a sex slave.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this requests seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client

privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF further objects to this Request in that it is vague and ambiguous with respect to its reference to “deals.” BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request to the extent it seeks confidential financial information from a non-party. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents,” which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

2. All Documents concerning any monetary payments or other consideration received by Jane Doe #3 from any media outlet in exchange for her statements (whether “on the record” or “off the record”) regarding Epstein, Dershowitz, Prince Andrew, Duke of York, and/or being a sex slave.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this requests seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF further objects to this Request to the extent it seeks documents already in Defendant’s possession, custody or control or which have been previously produced in this matter. BSF objects to this Request in that it seeks confidential financial information from a non-party. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for

example, requiring the non-party to search for “documents”, which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

3. All Documents that reference Dershowitz by name, which support and/or confirm the allegations set forth in Paragraphs 24-31 of Jane Doe #3's Declaration dated January 19, 2015 (Docket Entry #291-1) and/or Paragraph 49 of Jane Doe #3's Declaration dated February 5, 2015 (Docket Entry #310-1), which were filed in the Federal Action.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this requests seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF further objects to this Request in that the face of the Requests demonstrates that the Defendant is seeking to abuse the subpoena power by serving a subpoena on a non-party that seeks discovery unrelated to the underlying matter but, instead, allegedly relevant to a declaration filed in a “Federal Action” which is defined in Defendant’s definition section as “the matter styled *Jane Doe #1, et al. v. United States of America*. Case No. 08-80736-CJV-MARRA/JOHNSON (S.D. Fla.). BSF further objects to this Request to the extent it seeks documents already in Defendant’s possession, custody or control or which have been previously produced. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents”, which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

4. All photographs and video in the original, native format in which they were taken (not a paper copy) of Jane Doe #3 with Dershowitz.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it seeks information that is irrelevant to the Florida Defamation Action and is intended to harass this non-party. BSF further objects to this Request to the extent it seeks documents already in Defendant's possession, custody or control or which are in the control of Defendant's client and/or upon information and belief, in the possession, custody and control of the state or federal government. BSF further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential materials from a non-party. BSF objects to this Request in that it seeks photographs and videos of BSF's non-party client when she was a minor child and is intended to harass and intimidate BSF's client.

5. All photographs and video in the original, native format in which they were taken (not a paper copy) not produced in response to Request No.4, above, of Dershowitz at (i) Epstein's Manhattan home in New York City, New York; (ii) Epstein's home in Palm Beach, Florida; (iii) Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Epstein's airplane, on the same date and time that Jane Doe #3 were also present at such location.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request to the extent it seeks documents already in Defendant's possession, custody or control or which are in the control of Defendant's client and/or upon information and belief, in the possession, custody and control of the state or federal government. BSF further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to this matter. BSF objects to this Request to

the extent it seeks confidential materials from a non-party. BSF objects to this Request in that it seeks photographs and videos of BSF's non-party client when she was a minor child and is intended to harass and intimidate BSF's client.

6. Any documents and information that support and/or confirm Jane Doe #3's presence at the various locations named in Paragraphs 24-31 of Jane Doe #3's January 19, 2015 Declaration in the Federal Action on the particular dates and times when Dershowitz was also present.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this requests seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from a non-party. BSF further objects to this Request in that the face of the Request demonstrates that the Defendant is abusing the subpoena power by serving a subpoena on a non-party that seeks discovery unrelated to the underlying matter but instead allegedly relevant to a declaration filed in a "Federal Action" which is defined in Defendant's definition section as "the matter styled *Jane Doe #1, et al. v. United States of America*, Case No. 08-80736-CIV-MARRA/JOHNSON (S.D. Fla.)". BSF further objects to this Request to the extent it seeks documents already in Defendant's possession, custody or control or which have been previously produced. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for "documents", which has been defined by Defendant to include a broad

definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

7. Any documents and information that show Dershowitz was present at the various locations named in Paragraphs 24-31 of Jane Doe #3's January 19, 2015 Declaration in the Federal Action on the particular dates and times when Jane Doe #3 alleges to have been present.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from a non-party. BSF further objects to this Request in that the face of the Requests demonstrate that the Defendant is abusing the subpoena power by serving a subpoena on a non-party that seeks discovery unrelated to the underlying matter but, instead, allegedly relevant to a declaration filed in a “Federal Action” which is defined in Defendant’s definition section as “the matter styled *Jane Doe #1, et al. v. United States of America*, Case No. 08-80736-CIV-MARRA/JOHNSON (S.D. Fla.)”. BSF further objects to this Request to the extent it seeks documents already in Defendant’s possession, custody or control or which have been previously produced. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents,” which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

8. All statements, written or recorded, that Jane Doe #3 has provided to

anyone that reference Dershowitz by name or other description.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is overly broad and unduly burdensome in that it requests this non-party law firm to produce “all statements” that it’s non-party client has “provided to anyone.” BSF further objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from a non-party. BSF further objects to this Request to the extent it seeks documents already in Defendant’s possession, custody or control or which have been previously produced. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents,” which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

9. All notes of, or notes prepared for, any statements or interviews in which Jane Doe #3 referenced Dershowitz by name or other description.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or

any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from a non-party. BSF further objects to this Request to the extent it seeks documents already in Defendant's possession, custody or control or which have been previously produced. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for "documents", which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching "archives" and "back-up systems."

10. All Documents concerning any communications by Jane Doe #3 or on Jane Doe #3's behalf with any media outlet concerning Dershowitz or the Federal Action, whether or not such communications were "on the record" or "off the record."

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from a non-party. BSF further objects to this Request in that the face of the Request demonstrates that the Defendant is seeking to abuse the subpoena power by serving a subpoena on a non-party that seeks discovery unrelated to the underlying matter but, instead, allegedly relevant to a "Federal Action" which is defined in Defendant's definition section as "the matter styled *Jane Doe #1, et al. v. United States of America*. Case No. 08-80736-CIV-MARRA/JOHNSON (S.D. Fla.)". BSF further objects to this Request to the extent it seeks documents already in Defendant's possession, custody or control or which have been previously

produced. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents,” which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

11. All notes, writings, photographs, and/or audio or video recordings made or recorded by or of Jane Doe #3 on the dates on which Jane Doe #3 alleges she was present with Dershowitz, including but not limited to Jane Doe #3’s calendar, diary or journal entries on those dates, regardless whether the notes, writings, photographs, and/or audio or video recordings refer to Dershowitz. To the extent that any responsive materials are photographs or video recordings, please provide them in the original, native format in which they were taken (not a paper copy).

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from this non-party. BSF further objects to this Request to the extent it seeks documents already in Defendant’s possession, custody or control, or upon information and belief, in the possession, custody and control of the state or federal government. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request to the extent it seeks confidential materials from a non-party. BSF objects to this Request in that it seeks photographs and videos of BSF’s non-party client when she was a minor child and is intended to harass and intimidate BSF’s client. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents,” which has been defined by Defendant to include a broad definition of

electronically stored data, including a requirement of searching “archives” and “back-up systems.”

12. All Documents concerning Jane Doe #3's travel to or from locations for those occasions when she alleges she was present with Dershowitz.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF further objects to this Request to the extent it seeks documents already in Defendant's possession, custody or control, or upon information and belief, in the possession, custody and control of the federal or state government. BSF objects to this Request to the extent the information is already publicly available or previously produced. BSF objects to this Request to the extent it seeks confidential information from a non-party. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents”, which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

13. To the extent not produced in response to the above list of requested Documents, all notes, writings, photographs, and/or audio or video recordings made at any time that refer or relate in any way to Dershowitz.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that is overly broad and unduly burdensome in that it seeks “all writings” “made at any time” that “refer or relate in any way to Dershowitz.” Specifically, there is no time or scope limitation on this Request, nor is the Request tied to the underlying case. In addition,

BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential materials from a non-party. BSF objects to this Request in that it seeks photographs and videos of BSF's non-party client when she was a minor child and is intended to harass and intimidate BSF's client. BSF further objects to this Request to the extent it seeks documents already in Defendant's possession, custody or control, or upon information and belief, in the possession, custody and control of the federal or state government. BSF objects to this Request to the extent the information is already publicly available or previously produced. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for "documents," which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching "archives" and "back-up systems." BSF objects to this Request because it would be incredibly costly, time consuming and cause undue burden on this non-party to be forced to search for this incredibly broad Request that is not limited in any way by a time period nor limited to the underlying case.

14. All drafts of declarations or affidavits by Jane Doe #3 that relate in any way to Dershowitz and/or Epstein.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or

any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from this non-party. BSF further objects to this Request in that the face of the Request demonstrates that the Defendant is abusing the subpoena power by serving a subpoena on a non-party that seeks discovery unrelated to the underlying matter but, instead, allegedly relevant to a “Federal Action” which involves “Epstein” who is not a party to the Florida Defamation Action. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents,” which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

15. All Documents concerning any telephone, including any cellular telephone, used by Jane Doe #3 between January 1, 1999 and December 31, 2002.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request in that it seeks confidential information from a non-party. BSF objects to this Request as overbroad in that it seeks “all documents” for a three year period. BSF objects to this Request in that it seeks documents in the possession, custody and control of the Defendant or the Defendant’s client, Mr. Epstein.

16. Any diary, journal or calendar concerning Jane Doe #3’s activities between January 1, 1999 and December 31, 2002.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege,

or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential and highly sensitive personal information in the form of a “diary” or “journal” sought only to harass BSF’s non-party client. BSF objects to this Request in that it seeks information irrelevant to the underlying Florida Defamation Action.

17. All Documents concerning Jane Doe #3’s presence at or on (i) Jeffrey Epstein’s Manhattan home in New York City, New York; (ii) Mr. Epstein’s home in Palm Beach, Florida; (iii) Mr. Epstein’s Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein’s airplane from January 1, 1999 through December 31, 2002.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from a non-party. BSF further objects to this Request in that the face of the Request demonstrates that the Defendant is abusing the subpoena power by serving a subpoena on a non-party that seeks discovery unrelated to the underlying matter but, instead, allegedly relevant to a “Federal Action” which involves “Epstein” who is not a party to the Florida Defamation Action. BSF objects to this Request to the extent the documents are in the possession, custody and control of the Defendant and the Defendant’s client, Mr. Epstein. BSF objects to this Request to the extent the documents are in the possession, custody and control of the federal and state government. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents,” which has been defined by Defendant to

include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

18. All travel records of any kind, including but not limited to tickets, hotel room receipts or other documents concerning any travel undertaken by Jane Doe #3 between January 1, 1999 and December 31, 2002.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent the documents are in the possession, custody and control of the Defendant and the Defendant’s client, Mr. Epstein or have already been produced. BSF objects to this Request to the extent it seeks confidential information from a non-party. BSF objects to this Request to the extent the documents are in the possession, custody and control of the state or federal government. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action.

19. All records of any interviews given by Jane Doe #3 to any party concerning Dershowitz, Epstein, or any of their agents or associates.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from a non-party. BSF further objects to this Request in that the face of the Request demonstrates that the Defendant is seeking to abuse the subpoena power by serving a subpoena

on a non-party that seeks discovery unrelated to the underlying matter but, instead, allegedly relevant to a “Federal Action” which involves “Epstein” who is not a party to the Florida Defamation Action. BSF objects to this Request in that it is overly broad and vague in its failure to identify the “agents or associates” rendering it impossible for BSF to interpret the Request. BSF objects to this Request to the extent the documents are in the possession, custody and control of the Defendant and the Defendant’s client, Mr. Epstein. BSF objects to this Request to the extent the documents are, upon information and belief, in the possession, custody and control of the federal and state government. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents,” which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

20. All manuscripts and/or other writings, whether published or unpublished, created in whole or in part by Jane Doe #3, concerning Epstein and any of his agents or associates.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from a non-party. BSF further objects to this Request in that the face of the Request demonstrates that the Defendant is abusing the subpoena power by serving a subpoena on a non-party that seeks discovery unrelated to the underlying matter but, instead, allegedly relevant to a

“Federal Action” which involves “Epstein” who is not a party to the Florida Defamation Action. Indeed, this Request does not even reference the Defendant in this matter. BSF objects to this Request in that it is overly broad and vague in its failure to identify the “agents or associates” rendering it impossible for BSF to interpret the Request. BSF objects to this Request to the extent the documents are upon information and belief, in the possession, custody and control of the state or federal government. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for “documents”, which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching “archives” and “back-up systems.”

21. All Documents concerning Jane Doe #3's allegations that she met former President Bill Clinton, former Vice President Al Gore and/or Mary Elizabeth "Tipper" Gore on Little Saint James island in the U.S. Virgin Islands.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that on its face, it has absolutely nothing to do with the Florida Defamation Action. Former President Bill Clinton and the Gores are not in any way relevant to the Florida Defamation Action. Instead, this is a clear example of Defendant's attempt to abuse the subpoena power and rules of discovery by seeking information from a non-party law firm that is wholly unrelated to the case from which the subpoena has been issued. Defendant has gone on a very deep fishing expedition here and BSF objects to the overbroad and abusive nature of this Request. In addition, BSF objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common

interest privilege, or any other privilege or protection. BSF objects to this Request to the extent it seeks confidential information from this non-party. BSF objects to this Request to the extent the documents are, upon information and belief, in the possession, custody and control of the federal and state government and the Defendant and Defendant's client, Mr. Epstein. BSF further objects to this Request as overbroad, harassing and not calculated to lead to discoverable evidence relevant to the Florida Defamation Action. BSF objects to this Request in that it places an undue burden on this non-party law firm including, for example, requiring the non-party to search for "documents," which has been defined by Defendant to include a broad definition of electronically stored data, including a requirement of searching "archives" and "back-up systems."

22. All Documents concerning your retention by Jane Doe #3, including, but not limited to: signed letter of retainer, retention agreement, explanation of fees and/or any document describing the scope of retention.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request in that it seeks confidential information from a non-party. BSF further objects to this Request in that the face of the Request demonstrates that the Defendant is abusing the subpoena power by serving a subpoena on a non-party that seeks privileged information that has nothing to do with the Florida Defamation Action. BSF objects to this Request in that it is irrelevant to the Florida Defamation Action and is, instead, Defendant's abuse of the subpoena power to gain discovery for unrelated matters.

23. All Documents which are related to when Jane Doe #3 allegedly told her

attorneys that Alan Dershowitz was among the men she had sexual relations with.

Response: In addition to the Preliminary Statement and General Objections, BSF objects to this Request in that it is a non-party law firm and this Request seeks privileged communications between a non-party law firm and its non-party client. Specifically, BSF objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work product doctrine, the joint defense doctrine, the common interest privilege, or any other privilege or protection. BSF objects to this Request in that it seeks confidential information from a non-party. BSF objects to this Request in that it is irrelevant to the Florida Defamation Action and is, instead, Defendant's abuse of the subpoena power to gain discovery for unrelated matters.

Dated: April 9, 2015

Respectfully submitted,

BOIES, SCHILLER & FLEXNER LLP

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By: /s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was served by Electronic Mail and U.S. Mail on April 9, 2015 to the individuals identified on the attached Service List.

By: /s/ Sigrid S. McCawley
Sigrid S. McCawley

SERVICE LIST

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EXHIBIT 1

CNN

SHOW: New Day 8:30 AM EST

January 6, 2015 Tuesday

TRANSCRIPT: 010606CN.V42

SECTION: NEWS; International

LENGTH: 3114 words

HEADLINE: Plan Crash Survivor's Steps; Celebrities Fight Sex Scandals;
Remembering Mario Cuomo

BYLINE: Alisyn Camerota, Martin Savidge, John Berman, Michaela Pereira, Paul Callan, Chris Cuomo, Ana Cabrera

GUESTS: Wendy Murphy

HIGHLIGHT:

Friday night, seven-year-old Sailor Gutzler freed herself from the upside down wreckage of her family's plane, moving past the bodies of her mother, father, sister and cousin, and walked nearly a mile to Larry Wilkins' home in remote western Kentucky to get help. There are new developments in the sex scandal involving Prince Andrew and famed attorney **Alan Dershowitz**, including the fact that Dershowitz has counter sued [REDACTED]. Chris Cuomo, the son of the former governor of New York Mario Cuomo, reflects on his father's legacy as a politician and family man.

BODY:

JOHN BERMAN: All right, 32 minutes after the hour.

Buckingham Palace took the rare step to speak out about the sex abuse accusations against Prince Andrew, but is talking about it really the best strategy? How to handle ugly accusations, next.

CAMEROTA: New developments in the sex scandal involving Prince Andrew and famed attorney **Alan Dershowitz**. Moments ago we learned that **Alan Dershowitz** has counter sued [REDACTED], that's the woman who says that the lawyer sexually abused her when she was a teenager. Dershowitz is demanding his name be removed from her lawsuit and is asking for damages. Roberts says that a wealthy investor forced her into sex slavery when she was a teenager to please his powerful friends, including Dershowitz and Prince Andrew. The accuser now says she is being re-victimized. All of this raising big questions of how public figures should fight back against ugly accusations.

Let's bring in Paul Callan. He's a CNN legal analyst, criminal defense attorney and former prosecutor to talk about all this, also former prosecutor Wendy Murphy will join. She's an adjunct professor of sexual violence at New England Law in Boston.

Great to see both of you.

OK, let's start with the news this morning. Paul, **Alan Dershowitz**, hours ago, has filed this countersuit in Florida because he feels he's being defamed by this lawsuit by this woman, [REDACTED]. CNN is naming her because she has gone public with her name. So is that the best way for celebrities and high-profile people to handle allegations like this?

PAUL CALLAN, CNN LEGAL ANALYST: Well, **Alan Dershowitz** has done something you never see done in these cases. He's gone nuclear. I mean, he's going apoplectic. He's threatening to sue Roberts and he's starting his own lawsuit. Usually you try to make the whole thing go away so it's forgotten.

There's a complexity to this lawsuit because the allegations against Dershowitz, that he slept with this 15-year-old, and, incidentally, Prince Andrew as well, were included in court documents related to another lawsuit. And normally, anything you say in a court document relating to a pending lawsuit is, there's immunity. You can't sue somebody for saying that. So Dershowitz was baiting Roberts saying, why don't you say it publicly and I'm going to sue you because it's a lie. But apparently he must have stumbled on some theory that would give him grounds to sue around this court immunity doctrine. So it will be interesting to see it today.

CAMEROTA: Yes. Wendy, we have an example of **Alan Dershowitz** being so angry and so vociferous in denying these charges yesterday on NEW DAY. Watch this.

(BEGIN VIDEO CLIP)

ALAN DERSHOWITZ, ATTORNEY: I will take action. I am filing today a sworn affidavit denying categorically the truth. I'm seeking to intervene in the case. I am challenging her to file rape charges against me. I waive any statute of limitations, any immunity, because if she files a false rape charge against me, she goes to jail. The end result of this case should be she should go to jail, the lawyers should be disbarred and everybody should understand that I am completely and totally innocent.

(END VIDEO CLIP)

CAMEROTA: Wendy, what do you think about his strategy? Because there's one school of thought that says you never even dignify the allegations with a response.

WENDY MURPHY, FORMER PROSECUTOR: Yes, I mean the problem is he is almost in a protest too much state of mind for me. You know, I think the way the prince is handling it is, in a sense, more credible because it's more restrained in that exact way, Alisyn, we don't dignify these kinds of things. Of course it's silly. Of course it's not true.

You know, the problem with **Alan Dershowitz's** position is, he doesn't really know all of the evidence that they have. I mean what if this woman has, you know, intimate knowledge of things about his body parts, for example, that will be unassailable proof that, in fact, she did have access to his body. The kind of thing that no matter how much he yells and screams, he won't be able to rebut. That could be some pretty explosive proof against him.

CAMEROTA: It could be but --

MURPHY: I'm glad he did it.

CAMEROTA: Yes, I mean, you have to - MURPHY: Go ahead.

CAMEROTA: You have to assume that because he's make so vocal and so public a response that he believes that there's nothing like that out there.

Wendy, let me just stop you for a second -

MURPHY: Yes.

CAMEROTA: Because I want to tell you the victim in - the alleged victim in this case, [REDACTED], has now responded to CNN and **Alan Dershowitz** for calling her a liar. Let me tell you what she says. "It appears I am now being unjustly victimized again. These types of aggressive attacks on me are exactly the reason why sexual abuse victims typically remain silent and the reason why I did for a long time. That trend should change. I'm not going to be bullied into silence."

Wendy, your thoughts on her response?

MURPHY: Yes, I -- you know, it is a reason, in my work, you know, in decades of this work, it is something victims talk about a lot. I'm not going to speak out, especially against a wealthy, powerful, and influential person because they will have the ability to sue me falsely. That's the fear that a lot of real victims have.

Look, if **Alan Dershowitz** wants to use the legal system to demonstrate his innocence, he has the right to do that. The problem is, now that he's filed a public claim, the airing of all the details will come out, and what's he going to do if there is some kind of unassailable evidence against him? I mean he said, for example, he's only been at Jeffrey Epstein's house once and it was with his wife and children. What if it comes out that he was actually there, and there are photographs of him there on another occasion?

CALLAN: Well, you have to - you know, but, Wendy, I think you have to assume, Dershowitz can't be that stupid. I mean he taught at Harvard for long enough that I assume that basic facts like that he's going to be certain on. And if Dershowitz is in fact innocent of this charge, then he's not worried about body parts or locations where sex took place if no sex did take place.

CAMEROTA: Dershowitz also called for [REDACTED] attorneys to be disbarred. He believes they should never have taken this case. Let me quickly read to you their statement in response to **Alan Dershowitz**. "Out of respect for the courts desire to keep this case from being litigated in the press, we are not going to respond at this time to specific claims of indignation by anyone. Nevertheless, we would be pleased to consider any sworn testimony and documentary evidence Mr. Dershowitz would like to provide which he contends would refute any of our allegations."

Paul Callan, Wendy Murphy -

MURPHY: Yes. CAMEROTA: We have to leave it there. We're running out of time. But,

obviously, this case is not going away with **Alan Dershowitz's** new legal action this morning. We'll take it up again. Thanks so much for being here.

We'd love to know what you think about all this. You can tweet us @newday on the best way to handle allegations like this.

Let's go over to John.

BERMAN: All right, thanks, Alisyn.

An American giant is gone, but his legacy lives on. Our friend and colleague, Chris Cuomo, remembers his father, former New York Governor Mario Cuomo. A touching tribute that you do not want to miss, it's coming up next.

PEREIRA: So, the funeral for former New York governor Mario Cuomo gets under way in just over two hours right here in New York City. Dignitaries including Bill and Hillary Clinton, Attorney General Eric Holder are expected to pay their respects. You know, Chris mentioned to us, our NEW DAY family, that his father's life has served as a lesson for him since he was a very little boy, but that even now his pop is, as he called him, is still teaching him a lesson about what endures.

(BEGIN VIDEOTAPE)

MARIO CUOMO, FORMER GOVERNOR OF NEW YORK: When it's over, I want people to say, now, there was an honest person.

CHRIS CUOMO, CNN ANCHOR (voice-over): Pop's body is gone. I know because I counted out his pulse until his heart fell silent, 5:15 p.m. His two favorite numbers, 5 and 15. So now his baggy, brown eyes, solid grip of soft, thick fingers, oaken body, they're all gone. But what was most important about my father and to him has passed on.

Passed on as in still exists, just in a different way. His spirit passed on to his creator, the spirit of his message endures in us. Timeless and timely, a call to remember that if all do not share in America's success, there is no real success.

M. CUOMO: We can make it all the way with the whole family intact, and we have more than once, wagon train after wagon train, to new frontiers of education, housing, peace, the whole family aboard, constantly reaching out to extend and enlarge that family, all those struggling to claim some small share of America.

C. CUOMO: Our interconnectedness, our diversity as America's true strength. The value found in immigrants like our family desperate to work, to be part of the dream.

M. CUOMO: Thank you very much.

C. CUOMO: Two speeches in eight weeks would define his political life for many of you, the keynote in 1984.

UNIDENTIFIED MALE: Ronald Reagan rode into the '80s on a political white horse.

C. CUOMO: When he took on Ronald Reagan's shining city.

M. CUOMO: There are people who sleep in the city's streets, in the gutter, where the glitter doesn't show.

C. CUOMO: And his talk at Notre Dame, where he took on his church's notion of a Catholic politician.

M. CUOMO: We know that the price of seeking to force our belief on others is that they might someday force their belief on us. I protect my right to be a Catholic by preserving your right to be anything else you choose.

C. CUOMO: The man liked a challenge. Both relied on his core belief, we are here to help as many as we can in the best way we can, and that means protecting freedom, especially freedom from oppression. You will hear him called Hamlet on the Hudson. Question it. It's a media phrase more than a matter of fact. Pop did not think he should run for president.

M. CUOMO: Has nothing to do with my chances. It has everything to do with my job as governor, and I don't see that I can do both. Therefore, I will not pursue the presidency.

C. CUOMO: Many could not, or would not, accept that and tried publicly and privately to push him to do otherwise. For better or worse, that's what separated my father from other politicians. He, in fact, did not vacillate, and until the day he died, I never heard him regret the decision, period. But that is merely politics, which can't be forgotten quickly enough. What really matters has certainly been passed on to me, and my siblings, and our kids and that was pop's love, like a big bear hug on your heart kind of love. His unique sense of humor could be a weapon and a salve.

M. CUOMO: Christopher, you have - -

(LAUGHTER)

M. CUOMO: Let me tell you, Christopher. You have found so many unusual ways to heap new expenses on this family. You really have. I mean, and you've done it not after, you know, a sweating effort, he's done it naturally.

C. CUOMO: Who to be, how to be, from the simple, a handshake is firm, a tie is tied in a Windsor knot, a man shines his own shoes and does so often. He carries a hanky, one for others, one for himself. He wears a hat, not a cap, unless it's a cheese cutter. He always has cash and does not go Dutch. Pass first, shoot second. Play hard, and then play harder. From that to the sublime, all that matters in life is devotion to something bigger than yourself, family, the less fortunate, take up for them always. His passion for purpose, love recklessly, fight the good fight fiercely, outwork everyone. M. CUOMO: One of the simple things I wanted to achieve is I want to be governor, I want to be the hardest working there ever was.

C. CUOMO: Compete hard or not at all.

M. CUOMO: So far, you know, we haven't lost all year.

C. CUOMO: And never as a function of the chance of success.

M. CUOMO: This is our first game.

C. CUOMO: And for all the requirements on an individual, the most important was a command for the collective. Collaborate in making this world a better place.

M. CUOMO: What is our mission in this place? Your job is to make it as good as you can make it. That's all there is. There is no other significance.

C. CUOMO: None of that could ever be buried. Living on in the hearts, and minds, and actions of those who bear his name, who heeded his call to action then and now, that all will pass on. The man himself is gone. The father I went to in times of distress is not there. The truth hurts, pop would say, and this truth hurts worse than I imagined. But I also know what pop would tell me to do. Wipe my face, let my kids see that I love them, be there for my family, and do the right thing. And I will, pop, just like you.

M. CUOMO: Just keep going forward believing ever more deeply that it's right to give to people and to the world.

(END VIDEOTAPE)

PEREIRA: What a powerful tribute to his dad.

BERMAN: Like a big bear hug, I think, on all of our hearts as Chris would say so nicely in that piece.

CAMEROTA: And we got to know Mario Cuomo so much better through Chris' eyes. That was a real gift.

BERMAN: And we got to see, you know, take the stuffing out of Chris, too, sitting there as a young boy. It was amazing.

PEREIRA: But, you know, he loves in the very same way that his dad did. Have you noticed that?

CAMEROTA: Yes.

BERMAN: Big, big.

CAMEROTA: Beautiful. We'll be right back.

CAMEROTA: As you all know, Chris Cuomo loves telling the stories of people who are making an impact. So here's on such story. Former NFL player Ricardo Silva went from studying playbooks to textbooks. Today he's a high school math teacher motivating his students to impact your world. Here's Chris Cuomo.

(BEGIN VIDEOTAPE)

RICARDO SILVA, FORMER NFL PLAYER: You have four minutes, four minutes until competition.

C. CUOMO: Ricardo Silva is using his competitive edge to make math count for these high school students in Washington, D.C.

SILVA: Number three is what? My hope is to bring awareness to the students. Not just geometry, but total life outcomes. You can do whatever you want through education.

C. CUOMO: Silva's first job wasn't in a classroom, it was on a football field playing for the Detroit Lions.

SILVA: My mission was to get to college and start in the NFL. Now that's moved on to something more meaningful to me, which is providing opportunities to kids that do not necessarily know how to get where they need to be.

C. CUOMO: Helping Silva do just that is Teach for America. The program offers free classroom training to college graduates and professionals from various backgrounds. In exchange they teach in an underserved school for two years.

SILVA: Kids that have low socioeconomic status are, you know, not achieving as well as their more affluent counterparts, and we're trying to close the educational achievement gap. This is why I'm here.

C. CUOMO: It's certainly not for the paycheck or the ease of the job.

SILVA: Football, all you have to do is wake up every day, work out and do what the coaches tell you to do. In school you have to motivate young teenagers who are more interested in their social media outlets than math.

C. CUOMO: A seemingly impossible task, but Silva is up for the challenge.

SILVA: What's the first thing that we must do?

All I had was one person believing in me my entire life, which was my mom, and I feel like I can bring that to the kids.

Way to go, (INAUDIBLE).

All they need was one person telling them that they can do it and they can be successful.

(END VIDEOTAPE)

PEREIRA: And he's that one person.

BERMAN: Man, motivating kids tougher than any NFL linebacker, that's for sure.

CAMEROTA: Yes, right. So, for more on how you can help, go to CNN.com/impact.

BERMAN: All right, it is time now for "NEWSROOM" with Ana Cabrera who is in today for Carol Costello.

Ana, take it away.

ANA CABRERA, CNN ANCHOR: Good morning guys, and I haven't even said happy new year to you yet, so happy new year.

CAMEROTA: You, too.

EXHIBIT 2

SHOW: AUSTRALIAN BROADCASTING SYSTEM (ABC) 7.30 8:05 PM AEST ABC

January 6, 2015 Tuesday

LENGTH: 942 words

HEADLINE: Prince Andrew under pressure as Palace disputes teen sex scandal claims

REPORTERS: Philip Williams

BODY:

LEIGH SALES, PRESENTER: It's been a few years since Britain's Royal Family has been embroiled in a serious scandal, but once again, Prince Andrew has stepped forward.

He's accused of having sex with an underage girl in sensational details aired in an American court case.

The young woman says she was forced to entertain the Duke at the behest of his friend, billionaire and convicted paedophile Jeffrey Epstein.

Prince Andrew's ex-wife, ██████████ Ferguson, has leapt to his defence and Buckingham Palace is also strenuously denying the allegations.

But, as Europe correspondent Philip Williams reports, the claims have blown apart the always uneasy calm between the Palace and the British press.

PHILIP WILLIAMS, REPORTER: As fifth in line to the throne, whatever Prince Andrew does or says will never go unnoticed.

So when media reports about a lawsuit in the US emerged linking his name with underage sex, the long period of relative Royal calm was abruptly shattered.

This woman, ██████████, is believed to be the person named in court papers as "Jane Doe 3". In a newspaper interview she claims she was used for underage sex by American billionaire Jeffrey Epstein and says she was lent out to his rich and powerful friends, including Prince Andrew. It's claimed she had sex with him three times when she was 17 at Jeffrey Epstein's luxury Caribbean Island home and in New York and London, all denied by Prince Andrew.

VICTORIA MURPHY, UK MIRROR ROYAL CORRESPONDENT: If this doesn't go away quickly, if these allegations continue to be made, if more allegations are added, this could be incredibly damaging, not just for Andrew, but for the monarchy as a whole.

PHILIP WILLIAMS: It all seems a world away from the golden glow of recent Royal events - a wedding that cemented the popularity of Prince William and his bride. Followed of course by the arrival of baby Prince George. And for the Queen, a diamond jubilee, a celebration of 60 years on the throne, reason for her to smile as the nation and beyond said thanks for her never-ending job.

Over the weekend, that run of feel-good luck expired.

Normally with a story like this, Buckingham Palace would be more inclined to stay quiet, not to give any oxygen whatsoever to the sort of claims that have been made. But this time, it's very, very different. Not one, but two statements saying Prince Andrew is completely innocent of all the accusations.

VICTORIA MURPHY: They issued one statement initially in response to the allegations that Prince Andrew had had sex with an underage minor and that was what they were responding to and they were categorically denying that that had been the case. However, in doing that they had left the door open that perhaps he was only denying the fact that she was a minor and questions were being asked about that. So when more of her allegations surfaced, they decided that they needed to release an even stronger denial, categorically denying any sexual contact whatsoever.

PHILIP WILLIAMS: What isn't in dispute is that Prince Andrew and Jeffrey Epstein were good friends over a number of years.

In 2008, Mr Epstein was sentenced to 18 months' jail for soliciting an underage girl for the purposes of prostitution. That, after a controversial plea bargain. He remains a registered sex offender.

Yet in 2011, after his release, Prince Andrew was seen with his old friend in New York Central Park. That cost Prince Andrew an unpaid job he was said to have loved as the UK's Trade and Industry special representative, opening doors for British business overseas.

CHRIS BRYANT, LABOUR MP (March, 2011): But I'm afraid he's now just become a national embarrassment. And my worry is that sometimes when he goes on these trips, I'm not sure whether he's helping us out or he's just helping himself.

PHILIP WILLIAMS: For him, that door closed as a direct result of his association with Jeffrey Epstein.

VICTORIA MURPHY: People who know Prince Andrew have said that he is very loyal to his friends and that that is one of his strong points. However, I think that those closest to him now accept that that particular friendship and the loyalty to Jeffrey Epstein that continued until after he was convicted of paedophilia, I think people are now saying, you know, he accepts that that was a mistake. However, what is being said is that Andrew is only guilty of choosing his friends badly. He's not guilty of anything else.

PHILIP WILLIAMS: Prince Andrew isn't the only one named in the court documents, and while he isn't publicly defending himself, another of those accused certainly is.

Harvard Law Professor **Alan Dershowitz** has been doing the media rounds of the US and beyond. He denies even knowing his accuser, let alone having sex with her.

ALAN DERSHOWITZ, HARVARD LAW SCHOOL: My goal is to bring charges against the client and require her to speak in court. She - if she believes she has been hurt by me and by Prince Andrew, she should be suing us for damages. I welcome that lawsuit. I welcome any opportunity which would put her under oath and require her to state under oath these false allegations.

PHILIP WILLIAMS: Under the plea bargain struck with prosecutors by Jeffrey Epstein, it appears that other potential allegations may not end up tested in court and that could apply to possible co-conspirators, an arrangement alleged victims were not involved with.

Through Palace statements, the Duke of York has unequivocally denied any wrongdoing. He's not charged with anything, nor has he been questioned by police.

But the Queen's second son is in a spotlight he cannot wish away. His annus horribilis may have just begun.

LEIGH SALES: Philip Williams reporting from London.

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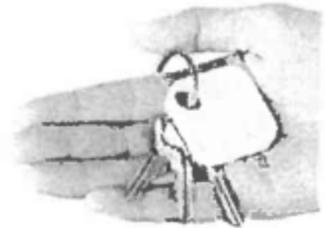
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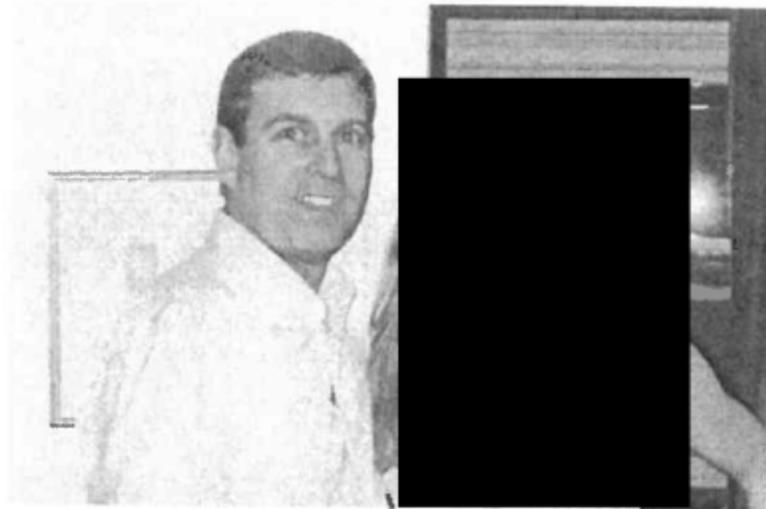
Florida judge tosses 'sex slave' claims involving Prince Andrew, Alan Dershowitz

BY OREN YANIV, DAREH GREGORIAN / NEW YORK DAILY NEWS / Published Tuesday, April 7, 2015, 12:49 PM / Updated Tuesday, April 7, 2015 1:11 PM

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Prince Andrew with [redacted], who claims Jeffrey Epstein made her a "sex slave."

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A Florida judge has tossed out explosive claims from a woman who said she was forced into having sex with England's Prince Andrew when she was a teenager.

In a ruling Tuesday, Judge Kenneth Marra denied a bid by "Jane Doe No. 3 and Jane Doe No. 4" to intervene in a long-running court case alleging the feds gave preferential treatment to billionaire perv Jeffrey Epstein.

Jane Doe No. 3 — whose identity has been revealed as [redacted], 31 — said in a bombshell court filing that Epstein turned her into a "sex slave" for him and his rich and famous pals when she was just 15.

Among those she said she was pushed into having relations were Prince Andrew — known in the British press as "Randy Andy" — and famed defense lawyer Alan Dershowitz.



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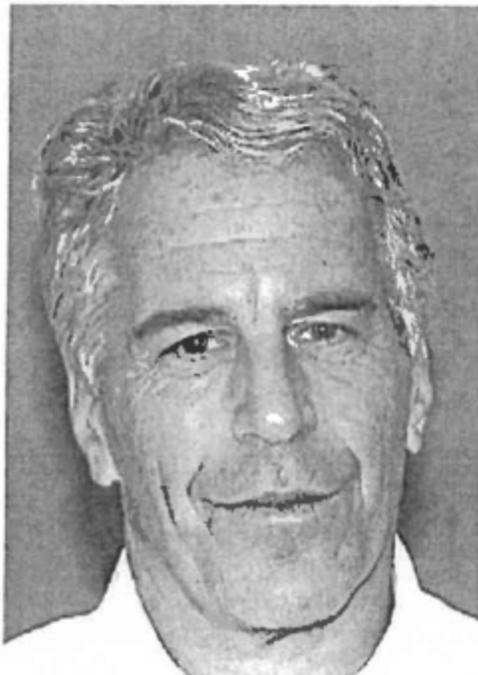




Prince Andrew is seen leaving Verbier ski resort in Switzerland in January amid the brewing sex scandal.

Dershowitz called the claims a libelous smear, and asked Marra to throw out the "outrageous and impertinent allegations."

In his ruling, the judge said the court "has considered Mr. Dershowitz's arguments, but it finds that his intervention is unnecessary" — as were Jane Doe No. 3's "lurid details."



The "sex slave" claims made in the Jeffrey Epstein case against the feds have been tossed by a Florida judge.

In an affidavit, Roberts detailed her alleged trysts with Dershowitz and others, including a wild orgy with Andrew, Epstein, and other apparently underage girls

"The factual details regarding with whom and where the Jane Does engaged in sexual activities are immaterial and impertinent to this central claim... especially considering that these details involve non-parties who are not related to the respondent Government. These unnecessary details shall be stricken," the judge wrote.

He also found there was no reason for the new Does to intervene in the case at all, since the original two plaintiffs had filed suit on behalf of all of Epstein's victims six years ago.

"The Court finds that justice does not require adding new parties this late in the proceedings," the judge wrote, and "it is entirely unnecessary

for Jane Doe 3 and Jane Doe 4 to proceed as parties in this action."

The judge did say the women could be called as witnesses when the case goes to trial.

"The necessary 'participation' of Jane Doe 3 and Jane Doe 4 in this case can be satisfied by offering their properly supported — and relevant, admissible, and non-cumulative — testimony as needed," Marra wrote.



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Alan Dershowitz was pleased to hear the judge throw out the "sex slave" allegations and says he will be vindicated.

Dershowitz told the Daily News he's pleased with the decision — but he still plans on going after [redacted] and her lawyers for defamation.

"She was hiding in Colorado ... but we found her and she will have to be deposed," he said. "The end result is that she'll go to jail because she will repeat her lies and we'll be able to prove it and she will end up in prison for perjury."

As for his own reputation, "I'm confident that at the end I'll be vindicated and everybody will understand this is a completely made up story."

Buckingham Palace has denied the allegations against Prince Andrew, which had been bolstered by a picture of the prince with his arm wrapped around [redacted] waist.

A palace spokesman declined to comment on the judge's ruling to The Associated Press.

A lawyer for the four Does, Brad Edwards, vowed to press on with the fight for Epstein's victims, who the feds have acknowledged number in the dozens.

"We are pleased by the Court's ruling recognizing that Jane Doe 3 and 4 have a right to participate without the need for formal intervention," he said.

In a statement, "Doe 3" said, "I'm happy to get to participate in this important case."

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