

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

CASE NO. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually,
and L.M., individually,

Defendant(s).

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

January 25, 2012
9:34 a.m. - 10:03 a.m.

SEARCY, DENNEY, SCAROLA, BARNHART & SHIPLEY, PA
2139 Palm Beach Lakes Boulevard
West Palm Beach Florida 33409

Stenographically Reported By:
Tammy Nestor, RPR

APPEARANCES :**ON BEHALF OF PLAINTIFF:**

JACK SCAROLA, ESQUIRE
SEARCY, DENNEY, SCAROLA
BARNHART & SHIPLEY, PA
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409

ON BEHALF OF DEFENDANT:

CHRISTOPHER E. KNIGHT, ESQUIRE
JOSEPH L. ACKERMAN, JR., ESQUIRE
FOWLER WHITE BURNETT, PA
Espirito Santo Plaza
1395 Brickell Avenue, 14th Floor
Miami, Florida 33131

JACK A. GOLDBERGER, ESQUIRE
ATTERBURY, GOLDBERGER & WEISS, PA
One Clearlake Centre, Suite 1400
250 Australian Avenue South
West Palm Beach, Florida 33401

DARREN K. INDYKE, ESQUIRE
301 East 66th Street, #10B
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1	Third Amended Complaint in LM v. Epstein	16

1 **THE VIDEOGRAPHER:** Today's date is
2 January 25, 2012. The time is approximately
3 9:34 a.m. This is the videotaped deposition of
4 Jeffrey Epstein in the matter of Epstein versus
5 Edwards.

6 This deposition is being conducted at 2139
7 Palm Beach Lakes Boulevard, West Palm Beach,
8 Florida.

9 The court reporter is Tammy Nestor of
10 Phipps Reporting. The videographer is Chris
11 Kennedy of Legal Video Services, Inc. in
12 association with Phipps Reporting.

13 And will the counsel please announce
14 appearances for the record.

15 **MR. SCAROLA:** My name is Jack Scarola.
16 I'm counsel for Brad Edwards. Brad is also
17 present.

18 **MR. KNIGHT:** Christopher Knight on behalf
19 of Jeffrey Epstein.

20 **MR. GOLDBERGER:** Jack Goldberger on behalf
21 of Jeffrey Epstein.

22 **MR. INDYKE:** Darren Indyke on behalf of
23 Jeffrey Epstein.

24 **MR. ACKERMAN:** Joseph Ackerman on behalf
25 of Jeffrey Epstein.

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JEFFREY EPSTEIN

Was called as a witness and after being duly sworn on oath was examined and testified as follows:

EXAMINATION

BY MR. SCAROLA:

Q Would you please state your full name and your current residence address?

A I'm Jeffrey Edward Epstein. And my residence address is 6100 Red Hook Boulevard in Virgin Islands.

Q Do you maintain any other residences presently?

A I have vacation homes in New Mexico, Palm Beach, New York, and Paris.

Q Would you give us the address of each, please.

A Yes. New York is 9 East 71st Street. New Mexico is Zorro Ranch Road. Paris is 22 Avenue Foch, F-O-C-H. And where else? Palm Beach is 358 El Brillo Way.

THE VIDEOGRAPHER: Pardon me, sir.

THE WITNESS: Yes.

THE VIDEOGRAPHER: Excuse me. Do you have your mike on? Thanks.

1 BY MR. SCAROLA:

2 Q Do you now or have you ever had a sexual
3 addiction?

4 MR. KNIGHT: I'm going to instruct him not
5 to answer the question. That's outside of the
6 area of this abuse of process lawsuit.

7 And just to let you know, he's here to
8 answer all the questions you want relative to
9 the abuse of process. The judge has been pretty
10 clear relative to the discovery regarding any of
11 the prior sexual allegations, et cetera. And
12 just so we don't waste your time or our time,
13 I'll be consistent on that per what the judge
14 has previously discussed regarding discovery.

15 MR. SCAROLA: Well, you and I have a very
16 different understanding of what the court's
17 prior rulings have been. But we'll let the
18 court deal with that.

19 BY MR. SCAROLA:

20 Q Do you now or have you ever had a sexual
21 preference for minors?

22 MR. KNIGHT: Same.

23 BY MR. SCAROLA:

24 Q Have you ever acted on a sexual preference
25 for minors?

1 MR. KNIGHT: Same.

2 BY MR. SCAROLA:

3 Q Have you ever informed anyone other than
4 your legal counsel that you have a sexual preference
5 for minors?

6 MR. KNIGHT: Same.

7 BY MR. SCAROLA:

8 Q Have you ever informed anyone other than
9 your legal counsel that you have acted on a sexual
10 preference for minors?

11 MR. KNIGHT: Same.

12 BY MR. SCAROLA:

13 Q Have you ever sought or received
14 evaluation, counseling, or treatment for any form of
15 sexual addiction?

16 MR. KNIGHT: Same.

17 BY MR. SCAROLA:

18 Q Have you ever sought or received
19 evaluation, counseling, or treatment for any
20 sex-related issue?

21 MR. KNIGHT: Same.

22 BY MR. SCAROLA:

23 Q Have you ever retained the services of a
24 consultant to assist in changing your public image
25 following your arrest on sex-related charges?

1 **MR. KNIGHT:** Same.

2 **BY MR. SCAROLA:**

3 **Q** Have you ever discussed with anyone
4 undertaking an effort to change your public image
5 following your arrest for and conviction of a
6 sex-related crime?

7 **MR. KNIGHT:** Same.

8 **BY MR. SCAROLA:**

9 **Q** Have you ever been convicted of a crime?

10 A Yes.

11 **Q** What was the crime of which you were
12 convicted?

13 A Two counts, one soliciting prostitution,
14 and procuring a minor for prostitution.

15 **Q** Did you, in fact, commit those acts?

16 **MR. GOLDBERGER:** I can invoke the Fifth
17 Amendment privilege for you or you can invoke
18 it yourself. I prefer you invoke the
19 privilege.

20 **THE WITNESS:** I'm going to invoke my Fifth
21 Amendment right.

22 **BY MR. SCAROLA:**

23 **Q** How many times have you solicited for
24 prostitution?

25 A I'm going invoke my Fifth Amendment right.

1 **Q** How many times have you solicited a minor
2 **for prostitution?**

3 **A** Same answer.

4 **Q** How many times have you solicited for
5 **prostitution in the State of Florida?**

6 **A** Same answer.

7 **Q** How many times have you solicited a minor
8 **for prostitution in the State of Florida?**

9 **A** Same answer.

10 **Q** How many times have you solicited for
11 **prostitution in the Virgin Islands?**

12 **MR. KNIGHT:** Can we stop it here just for
13 a second? Can we go off the record for one
14 minute?

15 **THE VIDEOGRAPHER:** The time is 9:39. We
16 are going off the record.

17 (Thereupon, a discussion was held off the
18 record.)

19 **MR. SCAROLA:** I would like you to take it
20 down, please.

21 **MR. KNIGHT:** Fine.

22 **MR. SCAROLA:** And we'll go back on the
23 record. Thank you.

24 **THE VIDEOGRAPHER:** Stand by.

25 **MR. KNIGHT:** I'm wondering if you have any

1 intention to ask any questions, and you may be,
2 any questions outside of this clearly harassing
3 area relative to issues that are outside of the
4 four corners of the complaint or whether this
5 is just going to be a continuance of questions
6 of this witness that have no other means of
7 advancing this lawsuit but only have means of
8 doing other things of which I won't -- I don't
9 care to list them here. Do you plan to go into
10 other areas?

11 **MR. SCAROLA:** I am -- I am planning on
12 taking a very thorough and comprehensive
13 deposition of Mr. Epstein.

14 **MR. KNIGHT:** Are you asking -- planning to
15 ask any questions that are not sexual or
16 criminal in nature?

17 **MR. SCAROLA:** Oh, I'm sure there will be
18 many that you would probably not consider
19 sexual or criminal in nature, but I don't know.

20 **MR. KNIGHT:** Let's proceed for a little
21 while, see what we can do, because certainly we
22 have taken the time out to come up here,
23 people's schedules have been made, et cetera,
24 people have traveled long distances, but we may
25 have to quit and go to the court.

1 BY MR. SCAROLA:

2 Q Have you ever solicited for prostitution
3 in the Virgin Islands?

4 A Same answer.

5 Q That is that the -- you are invoking your
6 Fifth Amendment --

7 A Yes.

8 Q -- right?

9 A Yes, Mr. Scarola.

10 Q Have you ever solicited for prostitution
11 in New York?

12 A Same answer.

13 Q Have you ever solicited for prostitution
14 in new Mexico?

15 A Same answer.

16 Q Have you ever solicited for prostitution
17 in Paris?

18 A Same answer.

19 Q Have you ever solicited for prostitution
20 anywhere at any time?

21 A Same answer.

22 Q Have you ever solicited a minor for
23 prostitution anywhere at any time?

24 A Same answer.

25 Q Who is the prostitute that you solicited

1 **for prostitution with respect to the claim on which**
2 **you were convicted?**

3 A Same answer.

4 **Q Who is the minor that you solicited for**
5 **prostitution with respect to the claim on which you**
6 **pled guilty?**

7 A Same answer.

8 **Q Did you, in fact, plead guilty to**
9 **soliciting for prostitution?**

10 **MR. KNIGHT:** Asked and answered.

11 **THE WITNESS:** Yes, sir.

12 **BY MR. SCAROLA:**

13 **Q Did you, in fact, plead guilty to**
14 **soliciting a minor for prostitution?**

15 A No.

16 **Q Where was it that you solicited for**
17 **prostitution in the manner -- in the matter in which**
18 **you pled guilty?**

19 A Same answer.

20 **Q When was it that you solicited for**
21 **prostitution in the matter in which you pled guilty?**

22 A Same answer.

23 **Q Have you ever discussed your sex-related**
24 **arrest or conviction with any reporter or news media**
25 **representative?**

1 **MR. KNIGHT:** I'm going to instruct you not
2 to answer the question.

3 **MR. SCAROLA:** And what is the basis of
4 that instruction?

5 **MR. KNIGHT:** What is the basis?

6 **MR. SCAROLA:** Yes.

7 **MR. KNIGHT:** What does it have to do with
8 this lawsuit? It's for no other reason other
9 than to harass him. There are plenty of areas
10 you can go into which are reasonable. We are
11 here.

12 **MR. SCAROLA:** So the objection is
13 relevancy, is that correct?

14 **MR. KNIGHT:** No, it goes beyond relevancy.

15 **MR. SCAROLA:** Well, what is it then?

16 **MR. KNIGHT:** Well, it is harassing. It is
17 used -- it is being used to intimidate the
18 witness. It is being used for various
19 different reasons. And I believe it is
20 improper.

21 **BY MR. SCAROLA:**

22 **Q** Have you ever discussed your sex-related
23 activities with minors in the State of Florida with
24 any reporter or news media representative?

25 **MR. KNIGHT:** Same instruction. We are

1 going to take a quick break if we can go off
2 the record.

3 **THE VIDEOGRAPHER:** The time is 9:30 --
4 9:40. We are going off the record.

5 (Thereupon, a recess was taken at
6 9:43 a.m.)

7 **THE VIDEOGRAPHER:** The time is 9:50 a.m.
8 We are back on the record.

9 **MR. KNIGHT:** As I mentioned earlier, we
10 are here to answer questions relevant to the
11 lawsuit that is at issue.

12 Relative to your question earlier and the
13 instruction not to answer, I do believe it was
14 appropriate, but I'm going to have
15 Mr. Goldberger address what he believes the --
16 is the -- our client is entitled to, but at the
17 same time, there are other issues we want to put
18 on the record.

19 I will allow you to ask more questions, but
20 if it's going to stay on this line, we may have
21 to adjourn.

22 **MR. GOLDBERGER:** Okay. This is Jack
23 Goldberger. A couple issues. First, as to the
24 questions that, Mr. Scarola, you asked
25 concerning conversations that Mr. Epstein may

1 or may not have had with, I believe you couched
2 it as news reporters or news media, he would be
3 invoking Fifth Amendment privileges as to those
4 questions in addition to the objection raised
5 by Mr. Knight.

6 **MR. KNIGHT:** I'm withdrawing the
7 instruction.

8 **MR. GOLDBERGER:** Okay. All right. Anyhow
9 he's invoking Fifth Amendment privileges as to
10 that line of questioning.

11 As to the total line of questioning where
12 you are asking Mr. Epstein about sex-related
13 issues, as you know, your client, Mr. Edwards,
14 has filed a lawsuit in federal court where he is
15 seeking to overturn the non-prosecution
16 agreement that Mr. Epstein is a party to.

17 I believe that you are asking these
18 questions in an effort to further Mr. Edwards'
19 attempts to set aside that non-prosecution
20 agreement, and I think it serves no purpose
21 other than to assist your client in that
22 lawsuit. And I just think it's totally outside
23 the realm of the discovery that is allowed in
24 this case. And I'm simply not going to allow my
25 client to answer those questions given the fact

1 that your client has filed an action to set
2 aside the non-prosecution agreement that
3 Mr. Epstein is a party to.

4 **MR. SCAROLA:** Would you please mark this
5 as Exhibit No. 1 to this deposition.

6 **MR. KNIGHT:** As soon as you get the
7 sticker on it, I'll look at that one.

8 (Thereupon, Deposition Exhibit No. 1 was
9 marked for identification.)

10 **THE VIDEOGRAPHER:** Is someone's phone by a
11 microphone or in their pocket?

12 **MR. GOLDBERGER:** I am.

13 **THE VIDEOGRAPHER:** If you can put it to
14 the side, please.

15 **MR. GOLDBERGER:** I'm all the way over
16 here.

17 **MR. KNIGHT:** Mine is off.

18 **MR. GOLDBERGER:** I'll shut it off.

19 **MR. KNIGHT:** Okay. Thank you.

20 **BY MR. SCAROLA:**

21 **Q** You have been handed a copy of what's been
22 marked as Exhibit No. 1 to this deposition. It is a
23 copy of Plaintiff's Third Amended Complaint in a
24 case styled LM versus Jeffrey Epstein.

25 **Have you seen this document before?**

1 A Not to the best of my recollection, no.

2 Q Do you recall having been sued by Bradley
3 Edwards on behalf of an individual who was
4 identified by the initials LM?

5 A Yes, sir.

6 Q And is this one of the cases that you
7 contend was abusively prosecuted by Bradley Edwards?

8 A I'm not sure if this is the exact
9 complaint.

10 Q Well, is this the case?

11 A I don't know.

12 Q Which case is it that you contend Bradley
13 Edwards abusively prosecuted against you?

14 A It was the LM case. I don't know if this
15 is the specific case.

16 Q Well, I want you to assume that there was
17 only one LM case that was filed by Bradley Edwards
18 against you.

19 A That's correct.

20 Q Do you have any recollection that is at
21 odds with that assumption?

22 A Yes, I do.

23 Q You have a recollection that there was, in
24 fact, a federal court case as well as a state court
25 case, correct?

1 A Correct.

2 Q All right. Now, is it your --

3 A I believe that's --

4 Q Is it your contention --

5 MR. KNIGHT: Finish your answer. Did you
6 finish your answer?

7 THE WITNESS: That's all right.

8 BY MR. SCAROLA:

9 Q Is it your contention that Bradley --

10 MR. KNIGHT: And any time you want to
11 finish your answer, please do so.

12 THE WITNESS: Sure.

13 BY MR. SCAROLA:

14 Q Is it your contention that Bradley Edwards
15 abusively prosecuted the state court case on behalf
16 of LM?

17 A I don't know. Sorry.

18 Q Is it your contention that Bradley Edwards
19 abusively prosecuted the federal court case on
20 behalf of LM?

21 MR. KNIGHT: Objection, asks for legal
22 conclusions. Obviously there were lawsuits
23 that were raised in this case.

24 MR. SCAROLA: You don't need to make a
25 speaking objection --

1 **MR. KNIGHT:** Okay.

2 **MR. SCAROLA:** -- that's intended to coach
3 the witness, Mr. Knight.

4 **MR. KNIGHT:** I'm going to object.

5 **MR. SCAROLA:** So if you say you are
6 objecting on the basis that it calls for a
7 legal conclusion, that's fine. And now I would
8 like the witness's answer unless you are
9 instructing him not to answer.

10 **MR. KNIGHT:** I'm not instructing him not
11 to answer.

12 **BY MR. SCAROLA:**

13 **Q** Okay. Then would you please answer the
14 question?

15 **A** I'm sorry. Would you repeat it?

16 **Q** Yes, sir. Is it your contention that
17 **Bradley Edwards abusively prosecuted the federal**
18 **court action on behalf of LM?**

19 **A** Yes, sir.

20 **Q** How?

21 **A** Bradley Edwards filed a 234-count federal
22 complaint in conjunction with his partner Scott
23 Rothstein to enable his partners at RRA to defraud
24 south Florida investors of millions of dollars.

25 His partner Scott Rothstein and his partner

1 Mr. Adler have -- excuse me, Mr. Rothstein has now in
2 deposition admitted that they needed to file a complaint to
3 show investors that there was real action, in
4 Mr. Rothstein's words, going on in federal court. The
5 investors had not been able to find a filed complaint and
6 had complained to Mr. Rothstein that there was no filed
7 complaints two days, excuse me, before Mr. Edwards filed
8 the federal complaint for 234.

9 **Q Were you ever served with that complaint?**

10 A Not to the best of my recollection.

11 **Q So one contention is that Mr. Edwards**
12 **abusively prosecuted a federal court action on**
13 **behalf of LM with which you were never served,**
14 **correct?**

15 A I had -- I was notified that the case was,
16 in fact, filed.

17 **Q But you were never served with the case,**
18 **correct?**

19 A I was notified that the case was filed.

20 **Q But you were never served with the case,**
21 **correct?**

22 A Not to the best of my recollection.

23 **Q Okay. What damage did you incur as a**
24 **consequence of the filing of a complaint with which**
25 **you were never served?**

1 A I incurred many legal -- much legal fees,
2 many legal fees, in fact, to try to figure out
3 why -- what was going on and, in fact, getting
4 prepared to defend the case though I had not yet
5 been served.

6 **Q Were the allegations in the federal**
7 **complaint on behalf of LM any different than the**
8 **allegations in the state court case on behalf of LM?**

9 A I don't recall.

10 **Q Did you, in fact, engage in any sexual**
11 **conduct with LM?**

12 A I'm sorry, but I'm sure -- the jury is
13 going to recognize this is simply meant to harass
14 me, and I'll have to take the Fifth Amendment since
15 your client, Mr. Edwards, is trying to overturn my
16 prosecution agreement.

17 **Q How many times did you engage in sexual**
18 **conduct with LM?**

19 A I'm going to have to invoke my Fifth
20 Amendment right again, sir.

21 **Q Do you know who LM is?**

22 A Again I'm going to assert my right.

23 **MR. KNIGHT:** We are going to go off the
24 record and take another break.

25 **THE VIDEOGRAPHER:** The time is 9:58. We

1 are going off the record.

2 (Thereupon, a recess was taken at
3 9:58 a.m.)

4 **THE VIDEOGRAPHER:** The time is 10:00. We
5 are on the record.

6 **MR. KNIGHT:** Okay. We have asked on
7 several occasions that you ask questions that
8 are relevant to the lawsuit at bar. There have
9 been some questions that were getting to it.
10 You are back into the sexual stuff which we
11 feel is inappropriate, and also relative to the
12 issues that were raised by Mr. Goldberger.

13 As such, we are going to recess and ask
14 further direction from the court on what is
15 allowable and what is not allowable in this
16 deposition.

17 **MR. SCAROLA:** So you are terminating the
18 deposition at this time?

19 **MR. KNIGHT:** We are recessing the
20 deposition to get direction from the court.

21 **MR. SCAROLA:** Until when?

22 **MR. KNIGHT:** We will find out what the
23 court says.

24 **MR. SCAROLA:** When? Are you contacting
25 the judge right now?

1 **MR. KNIGHT:** I am not. We are going to
2 file an appropriate motion and we are going to
3 take it to the judge and see what he does.
4 Thank you.

5 **MR. SCAROLA:** So that the record is clear,
6 it is my intention to ask very specific
7 questions about every factual allegation
8 included in every claim brought by Mr. Edwards
9 on behalf of every victim in every case in
10 which it is alleged that Mr. Edwards has
11 abusively prosecuted that claim.

12 I want to know about the connection between
13 Mr. Epstein and each one of those alleged
14 victims. I want to know about every individual
15 who had information concerning the events that
16 are alleged in those complaints, every
17 individual who was in a position to have
18 possibly had information about the events
19 alleged in those complaints.

20 I want to ask this witness about every
21 person whose deposition was taken and scheduled
22 to be taken, the relationship of those persons
23 to Mr. Epstein, knowledge that those persons may
24 have with respect to Mr. Epstein's activities
25 with minors, other crimes committed by

1 Mr. Epstein as part of an ongoing and continuous
2 course of conduct supportive of claims for
3 punitive damages against Mr. Epstein and
4 supportive of RICO claims against him.

5 And had this deposition been permitted to
6 continue, we would have covered each of those
7 areas and substantially more.

8 **MR. KNIGHT:** Thank you.

9 **THE VIDEOGRAPHER:** The time is 10:03. We
10 are going off the record.

11 (Thereupon, the deposition was adjourned at
12 10:03 a.m.)

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CERTIFICATE OF REPORTER

STATE OF FLORIDA

COUNTY OF BROWARD

I, TAMMY NESTOR, Registered Professional Reporter, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of JEFFREY EPSTEIN, that a review of the transcript was requested, and that the transcript is a true record of my stenographic notes

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 25th day of January 2012.

TAMMY NESTOR, RPR

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF BROWARD

I, the undersigned authority, certify that
JEFFREY EPSTEIN personally appeared before me and was
duly sworn.

Witness my hand and official seal this 25th
day of January 2012.

Tammy Nestor, Court Reporter
Notary Public, State of Florida
Commission No.: EE 133933
Commission Exp. Date: 10/23/2015

January 25, 2012

FOWLER WHITE BURNETT, PA
1395 Brickell Avenue, 14th Floor
Miami, Florida 33131
ATTN: CHRISTOPHER E. KNIGHT, ESQUIRE

Re: Epstein v Edwards
Case No. 502009CA040800XXXXMBAG

Please take notice that on the January 25, 2012, you gave your deposition in the above cause. At that time you did not waive your signature. The transcript is now available for your review.

Please call (888)811-3408 or email production@phippsreporting.com to schedule and appointment between the hours of 9:00 a.m. and 4:00 p.m., Monday through Friday, for you to have access on your computer to a read-only version of the transcript.

If you are a party in this action and your attorney has ordered a copy of this transcript, you may wish to read their copy of the transcript. In that event, please execute the Errata Sheet, which can be found at the back of the transcript and return it to us for distribution to all parties.

If you do not read and sign the deposition within thirty (30) days, the original, which has already been forwarded to the ordering attorney, may be filed with the Clerk of the Court.

If you wish to waive your signature now, please sign your name in the blank at the bottom of this letter and return it to us.

Very truly yours,

TAMMY NESTOR, RPR
Phipps Reporting, Inc.
1615 Forum Place, Suite 500
West Palm Beach, Florida 33401

I do hereby waive my signature.

JEFFREY EPSTEIN

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Z	1:12 4:2 27:1,6	9	
Zorro (1)	28:5	9 (1)	
5:18	25th (2)	5:17	
<hr/>	25:17 26:9	9:00 (1)	
#	250 (1)	27:9	
#10B (1)	2:13	9:30 (1)	
2:15	<hr/>	14:3	
<hr/>	3	9:34 (2)	
1	30 (1)	1:13 4:3	
1 (4)	27:15	9:39 (1)	
3:12 16:5,8,22	301 (1)	9:15	
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26:14		14:4	