

numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

563. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

564. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right 137

**COUNT 137**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**June 2005 – Incident 1**

565. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

566. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

567. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

568. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 138**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**June 2005 – Incident 2**

569. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

570. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

571. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

572. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 139**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**June 2005 – Incident 3**

573. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

574. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

575. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

576. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 140**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**June 2005 – Incident 4**

577. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

578. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

579. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

580. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 141**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**July 2005 – Incident 1**

581. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

582. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

583. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

584. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 142**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**July 2005 – Incident 2**

585. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

586. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is

therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

587. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

588. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 143**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**July 2005 – Incident 3**

589. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

590. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

591. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

592. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 144**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**July 2005 – Incident 4**

593. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

594. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this

Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

595. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

596. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 145**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**August 2005 – Incident 1**

597. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

598. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

599. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

600. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 146**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**August 2005 – Incident 2**

601. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

602. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

603. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

604. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 147**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**August 2005 – Incident 3**

605. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

606. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

607. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

608. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 148**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**August 2005 – Incident 4**

609. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

610. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

611. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

612. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 149**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**September 2005 – Incident 1**

613. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

614. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

615. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

616. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 10**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**September 2005 – Incident 2**

617. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

618. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

619. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

620. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 151**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**September 2005 – Incident 3**

621. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

622. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

623. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

624. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 152**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**September 2005 – Incident 4**

625. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

626. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

627. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

628. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 153**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**October 2005 – Incident 1**

629. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

630. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

631. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

632. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 154**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**October 2005 – Incident 2**

633. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

634. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

635. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

636. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 155**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**October 2005 – Incident 3**

637. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

638. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

639. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

640. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

**COUNT 156**

**Cause of Action Pursuant to 18 U.S.C. § 2255**

**October 2005 – Incident 4**

641. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

642. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

643. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

644. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands trial by jury on all issues triable as of right by a jury.

DATED July 24, 2009

Respectfully Submitted,



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Bradley J. Edwards  
ROTHSTEIN ROSENFELDT ADLER  
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JS 44 (Rev. 2/08)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

<p><b>I. (a) PLAINTIFFS</b> L.M.</p> <p><b>(b) County of Residence of First Listed Plaintiff</b> <u>Palm Beach</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p><b>(c) Attorney's (Firm Name, Address, and Telephone Number)</b> Rothstein Rosenfeldt Adler 401 East Las Olas Blvd., Suite 1650 Fort Lauderdale, FL 33301 - Phone 954-522-3456</p>	<p><b>DEFENDANTS</b> JEFFREY EPSTEIN</p> <p>County of Residence of First Listed Defendant <u>Palm Beach</u> (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT LAND INVOLVED.</p> <p>Attorneys (If Known) Bradley J. Edwards</p>
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(d) Check County Where Action Arose:  MIAMI-DADE  MONROE  BROWARD  PALM BEACH  MARTIN  ST. LUCIE  INDIAN RIVER  OKEECHOBEE HIGHLANDS

<p><b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p> <p><i>9:09CV 81092 - John Seltzer</i></p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Incorporated or Principal Place of Business in This State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Foreign Nation</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/>	<input type="checkbox"/>	Incorporated or Principal Place of Business in This State	<input type="checkbox"/>	<input type="checkbox"/>	Citizen of Another State	<input type="checkbox"/>	<input type="checkbox"/>	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/>	<input type="checkbox"/>	Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>
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Citizen of Another State	<input type="checkbox"/>	<input type="checkbox"/>	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/>	<input type="checkbox"/>																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>																				

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

<p><b>CONTRACT</b></p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment &amp; Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p>	<p><b>TORTS</b></p> <p><b>PERSONAL INJURY</b></p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel &amp; Slander</p> <p><input type="checkbox"/> 330 Federal Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input checked="" type="checkbox"/> 360 Other Personal Injury</p> <p><b>PERSONAL INJURY - Med. Malpractice</b></p> <p><input type="checkbox"/> 362 Personal Injury - Med. Malpractice</p> <p><input type="checkbox"/> 365 Personal Injury - Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p><b>PERSONAL PROPERTY</b></p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p><b>FORFEITURE/PENALTY</b></p> <p><input type="checkbox"/> 610 Agriculture</p> <p><input type="checkbox"/> 620 Other Food &amp; Drug</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 630 Liquor Laws</p> <p><input type="checkbox"/> 640 R.R. &amp; Truck</p> <p><input type="checkbox"/> 650 Airline Regs.</p> <p><input type="checkbox"/> 660 Occupational Safety/Health</p> <p><input type="checkbox"/> 690 Other</p> <p><b>LABOR</b></p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Mgmt. Relations</p> <p><input type="checkbox"/> 730 Labor/Mgmt. Reporting &amp; Disclosure Act</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Empl. Ret. Inc. Security Act</p> <p><b>IMMIGRATION</b></p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 463 Habeas Corpus-Alien Detainee</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p><b>BANKRUPTCY</b></p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p><b>PROPERTY RIGHTS</b></p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p><b>SOCIAL SECURITY</b></p> <p><input type="checkbox"/> 861 HIA (1395(f))</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p><b>FEDERAL TAX SUITS</b></p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS—Third Party 76 USC 7609</p>	<p><b>OTHER STATUTES</b></p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 810 Selective Service</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 875 Customer Challenge 12 USC 3410</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 892 Economic Stabilization Act</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 894 Energy Allocation Act</p> <p><input type="checkbox"/> 895 Freedom of Information Act</p> <p><input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>
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**V. ORIGIN** (Place an "X" in One Box Only)

1 Original Proceeding  2 Removed from State Court  3 Re-filed (see VI below)  4 Reinstated or Reopened  5 Transferred from another district (specify)  6 Multidistrict Litigation  7 Appeal to District Judge from Magistrate Judgment

**VI. RELATED/RE-FILED CASE(S).** (See instructions second page):

a) Re-filed Case  YES  NO      b) Related Cases  YES  NO

JUDGE \_\_\_\_\_ DOCKET NUMBER 9:08-cv-80119

**VII. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

18 USC Section 2255

LENGTH OF TRIAL via 10-14 days estimated (for both sides to try entire case)

**VIII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23  DEMAND \$ IN EXCESS 1,000,000.00  CHECK YES only if demanded in complaint: JURY DEMAND:  Yes  No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE      SIGNATURE OF ATTORNEY OF RECORD \_\_\_\_\_      DATE 7-24-09

FOR OFFICE USE ONLY

AMOUNT 35000 RECEIPT # \_\_\_\_\_ IFP \_\_\_\_\_

546977