

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.

**RESPONSE TO DEFENDANT ALAN DERSHOWITZ'S MOTION FOR
CLARIFICATION OF CONFIDENTIALITY ORDER OR RELIEF FROM THAT ORDER**

Non-Party [REDACTED], by and through undersigned counsel, hereby responds to Defendant Alan Dershowitz's Motion for Clarification of Confidentiality Order or Relief From that Order and states as follows:

FACTUAL BACKGROUND

On November 12, 2015 this Court issued an Order granting in part, non-party [REDACTED] [REDACTED]'s Motion to Quash the subpoena served by Defendant Alan Dershowitz and ordered protective limits relating to her deposition. *See* Exhibit A, November 12, 2015 Order. On December 18, 2016, this Court entered a Confidentiality Order holding that non-party [REDACTED] [REDACTED] deposition would be confidential. *See* Exhibit B, December 18, 2015 Confidentiality Order. On January 16, 2016, Ms. [REDACTED] testified at her deposition in accordance with this Court's Order. The deposition was labelled confidential in accordance with this Court's Order. As the Court knows, Ms. [REDACTED] was a victim of sexual trafficking when she was a minor child. Indeed, the U.S. Attorney's Office for the Southern District of Florida has specifically recognized

her as a “victim” of federal sex offenses. Unsurprisingly, her deposition contains highly sensitive information about her experiences as a minor child, including detail descriptions of sexual crimes committed against her.

ARGUMENT

1. Non-Party ██████████ Agrees That Her Deposition Should Be Provided Confidentially To Law Enforcement to Investigate All The Crimes Committed Against Her

Defendant Dershowitz seeks to have the Court grant an exception to the confidential nature of the deposition so that it can be provided to the Office of the State Attorney and the Office of the United States Attorney for investigative purposes. Specifically, Defendant Dershowitz states in his motion that he is hoping to have law enforcement investigate whether Ms. ██████████ committed perjury by stating in her previously filed affidavit that it is her recollection that she witnessed former President Bill Clinton on Jeffrey Epstein’s island in the United States Virgin Islands (“USVI”).¹

Setting aside Defendant Dershowitz’s baseless claims of perjury, Ms. ██████████ agrees that her confidential deposition should be provided to law enforcement, including the United States Attorney and the State Attorney in each jurisdiction where any alleged crimes occurred so that they may investigate all of the crimes committed against her when she was a minor child. To ensure that justice is served and that Defendant Dershowitz’s request is not just another charade designed only to bully a sexual abuse victim, Ms. ██████████ asks the Court to impose the following reasonable conditions relating to the disclosure:

- Mr. Dershowitz agrees and is directed to cooperate with authorities and answer all questions relating to the investigation of crimes against Ms. ██████████

¹ Defendant Dershowitz conveniently ignores that publicly available flight logs of Jeffrey Epstein’s private planes demonstrate that President Clinton travelled with Jeffrey Epstein and others to various locations throughout the world including Europe, Africa and Asia. See Exhibit C, Excerpts of Flight Logs from Jeffrey Epstein’s private plane.

- Mr. Dershowitz agrees to make his client, Jeffrey Epstein, and others with relevant testimony and with whom he has testified he shares a “common interest” – at least Epstein and Maxwell – available to any law enforcement agency reviewing any alleged criminal activities; or in the alternative, to attest to this Court that those necessary witnesses have consented to full cooperation in the investigation Mr. Dershowitz is seeking permission to initiate.
- Mr. Dershowitz agrees to waive the statute of limitations in all jurisdictions for any criminal conduct he participated in or was aware of relating to Ms. [REDACTED] so that law enforcement can pursue any necessary charges. Defendant Dershowitz proclaimed that he was willing to waive any statute of limitation for criminal conduct so this should not be an issue. See Exhibit D, January 12, 2016 Deposition Transcript of Alan Dershowitz at 395. “I had talked about the statute of limitations for criminal purpose was what I said, that I would waive the statute of limitations for criminal purposes.”
- Mr. Dershowitz agrees to provide the names and contact information for each State Attorney and United States Attorney for which he has or is planning to provide information relating to Ms. [REDACTED] and agrees to jointly, with Ms. [REDACTED] counsel, request that the State Attorney and United States Attorney, in the relevant jurisdictions, investigate all potential criminal conduct. Both parties may provide any relevant information they have that may assist the authorities with their investigation.
- For all other purposes non-party Ms. [REDACTED] January 16, 2016 deposition transcript shall remain confidential and sealed other than for confidential disclosure to law enforcement as described above.

2. Mr. Dershowitz Has No “Evidence” of Perjury And Instead Is Simply Trying To Bully This Victim

As explained above, Defendant Dershowitz wrongly suggests to this Court that non-party Virginia [REDACTED] has committed perjury in an effort to taint the Court against this victim. His only

“evidence” of this alleged perjury is a self-serving opinion from his retained expert that an “absence of records” in response to a FOIA request, establishes that former President Clinton was never on Jeffrey Epstein’s island in the USVI. Defendant Dershowitz misrepresents the government’s response. The government is only required to conduct a reasonable search of readily accessible records. Accordingly, an “absence of records” response does not mean that records do not exist. It simply means that in the course of the search, no records were found. See *Cunningham v. U.S. Dept. of Justice*, 961 F.Supp. 2d 226, 236 (D.C. 2013) (court reasoning that

“[t]he adequacy of a search is measured by a standard of reasonableness... The question is not

whether other responsive records may exist, but whether the search was adequate.”); *Wilbur v. C.I.A.*, 355 F.3d 675, 678 (D.C. 2004) (court explaining that “the agency’s failure to turn up a particular document, or mere speculation that as yet uncovered documents might exist, does not undermine the determination that the agency conducted an adequate search for the requested records.”). Moreover, when dealing with a former President’s security detail travel, there are a number of reasons why the government may not disclose those records.

As explained above, public flight records from Jeffrey Epstein’s private plane show that President Clinton traveled with Jeffrey Epstein on multiple occasions. Nevertheless, if Defendant Dershowitz wants to pursue this issue before the Court, then he needs to produce for deposition testimony in this case and the proposed criminal investigation, the other witnesses that were present on the island at the time former President Clinton was alleged to have visited, including his client Jeffrey Epstein, and Ghislaine Maxwell, to whom he has testified he is party to a joint defense agreement. It is worth noting on that point, that despite Mr. Epstein’s counsel’s attendance at depositions in this case, and Defendant Dershowitz’s claim that Mr. Epstein is still his client, Mr. Epstein has taken extreme measures to avoid being deposed in this case despite being ordered to deposition by this Court.

Indeed, it is also noteworthy that during Defendant Dershowitz’s recent deposition, counsel for Mr. Edwards and Mr. Cassell asked Defendant Dershowitz the following question: “Was [REDACTED] lying when she said Jeffrey Epstein socialized with Bill Clinton during the relevant time period?” Depo Tr. Of Alan Dershowitz, Vol. 4, January 12, 2016 at 511. Before Defendant Dershowitz could answer, Mr. Dershowitz’s legal counsel interposed an attorney-client privilege objection. *Id.* Perhaps Mr. Epstein’s defense counsel can provide to the Court an appropriate privilege log regarding that objection – and all the communications between Mr. Epstein and Defendant Dershowitz that would have been revealed in answer to that question – so that the Court will have the benefit of a full record in ruling on this motion.

CONCLUSION

WHEREFORE, Non-Party [REDACTED] respectfully requests that this Court allow a limited release of her confidential deposition transcript to law enforcement subject to the terms set forth above on pages 2-3.

Dated: February 8, 2016

Respectfully submitted,

BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, Florida 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022

By: /s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.
Florida Bar No. 129305

Attorney for Non-Party [REDACTED]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 8, 2016, a true and correct copy of the foregoing was served by Electronic Mail to the individuals identified below.

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

<p>Thomas E. Scott [REDACTED] Steven R. Safra [REDACTED] COLE, SCOTT & KISSANE, P.A. 9150 S. Dadeland Blvd., Suite 1400 Miami, Florida 33156 [REDACTED]</p> <p>Richard A. Simpson [REDACTED] Mary E. Borja [REDACTED] Ashley E. Eiler [REDACTED] WILEY REIN, LLP 1776 K Street NW Washington, D.C. 20006</p> <p><i>Counsel for Defendant Alan Dershowitz</i></p>	<p>Jack Searola SEARCY DENNEY SCAROLA BARNHART & SHIPLEY, P.A. [REDACTED] 2139 Palm Beach Lakes Blvd. West Palm Beach, FL 33409-6601</p> <p><i>Attorney for Plaintiffs</i></p>
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EXHIBIT A

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

CIVIL DIVISION

CASE NO. CA15-000072

BRADLEY F. EDWARDS, and
PAUL G. CASSELL,

Plaintiffs,

v.

ALAN DERSHOWITZ,

Defendant.

**ORDER ON BOIES, SCHILLER & FLEXNER LLP AND JANE DOE NO. 3'S MOTIONS
TO QUASH SUBPOENAS OR FOR PROTECTIVE ORDER**

This Cause comes before the Court on November 2, 2015 upon Boies, Schiller & Flexner LLP's Motion to Quash Subpoena Or For Protective Order and Jane Doe No. 3's Motion to Quash Subpoena Or For Protective Order.

Having reviewed the record and being otherwise fully advised, the Court hereby Orders:

1. Non-Party Law Firm Boies, Schiller & Flexner LLP's Motion to Quash Subpoena is **GRANTED**. The subpoena to Boies, Schiller & Flexner LLP is quashed in its entirety.
2. Non-Party Jane Doe No. 3's Motion to Quash Subpoena or For Protective Order is Denied in Part, Granted in part, as follows:
 - a. The Motion to Quash is Granted as to Requests Nos. 9, 17, 18, 20, and 23. The Motion is denied as to the remaining Requests.
 - b. A Confidentiality Order shall be entered.
 - c. The deposition of Jane Doe No. 3 shall be limited to 4 hours without prejudice to request for additional time in the future.
 - d. The deposition will be taken at the law firm representing the witness, Boies, Schiller & Flexner LLP.

e. There shall be a special master, paid by the Defendant, present at the deposition, to rule on objections.

f. The Defendant Alan Dershowitz can be present at the deposition.

g. The deposition will be limited to the issues of this case without prejudice for another deposition, if required, in the future. The issues and said limitations will be determined by the special master.

DONE AND ORDERED in Broward County, Florida on this ____ day of November, 2015.

Honorable Judge Thomas Lynch
Circuit Judge

cc: Counsel of Record

NOT OFFICIAL COPY

EXHIBIT B

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. CA15-000072

Plaintiffs,

v.

ALAN DERSHOWITZ,

Defendant.

ORDER ON BOIES, SCHILLER & FLEXNER LLP'S MOTION TO SEAL

This Cause comes before the Court on December 18, 2015 upon Boies, Schiller & Flexner LLP's Motion to Seal "Exhibit B, Affidavit of Alan M. Dershowitz Regarding Meetings with David Boies" to Defendant Alan M. Dershowitz's Motion in Limine to Overrule Objections As to Application of Settlement Rules, Filing # 35429605 E-Filed 12/11/2015 at 10:08:04 a.m.

Having reviewed the record and being otherwise fully advised, the Court hereby Orders:

Thomas M. Lynch

DONE AND ORDERED in Broward County, Florida on this 18 day of December, 2015.

Honorable Judge Thomas Lynch
Circuit Court Judge

THOMAS M. LYNCH
DEC 18 2015
TRUE COPY

cc: Counsel of Record

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EXHIBIT C

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No	Remarks, Procedures, Manoeuvres, Endorsements	Number of Landings	Aircraft Category
			From	To					
2002									
13	B-727-314	N9083C	LGMN	G-MTT	120	JG, M, SK, AP, [REDACTED]	1	ASB, AC, G-LSO, 1754	
13	"	"	G-MTX	G-MNC	121	JG, G, M, SK, CL, AP	1		
13	"	"	G-MME	LPAZ	122	JG, M, SK, AP, CL, PRESIDENT CLEMENT DICK, BOND, MINK, & SCARLE SERVICE	2		
13	"	"	LPAZ	JFK	123	JG, M, SK, AP, CL, PRESIDENT CLEMENT DICK, BOND, MINK, & SCARLE SERVICE	2		
18	"	"	JFK	PBI	124	JG, S, H, E, Y, L, E, W, I, S, 2, F, E, M, A, L, E	5		
19	"	"	PBI	JAX	125	WINDY RODRIGUEZ GREG WOLF-PART ALYSSA HERRBERT - C CHECK	2		
4	G-1159B	N9093C	PBI	MVY	1583	JG, F, E, M, A, L, E	1		
4	"	"	MVY	BED	1584	JG, F, E, M, A, L, E	2		
4	"	"	BED	TGB	1585	JG, F, E, M, A, L, E	7		
5	"	"	TGB	SAX	1586	JG, F, E, M, A, L, E	9		
6	G-172X	N7395P	ACC	ACC		172 CHECK OUT	3		
6	20613	11414AW	ACC	ACC			3		
15	B-727-314	N9083C	JAX	TAX	126	S-CHECK FLIGHT TEST PLTS (EMERGENCY)	1		
16	"	"	JAX	PBI	127	REPAIR FROM C-CHECK	1		
17	G-1159-B	N9093C	SAX	TGB	134	JG, G, M, SK, CL, AP, PRESIDENT CLEMENT DICK, BOND, MINK, & SCARLE SERVICE	1		
18	"	"	TGB	PBE	135	JG, G, M, SK, CL, AP, PRESIDENT CLEMENT DICK, BOND, MINK, & SCARLE SERVICE	3		
21	B-727-314	N9083C	PBI	REST	136	JG, F, E, M, A, L, E	2		
25	"	"	REST	JFK	128	JG, F, E, M, A, L, E	2		
28	"	"	JFK	LFPB	129	JG, F, E, M, A, L, E	2		
					130	JG, F, E, M, A, L, E	6		

Page Total	6
Amount Forward	6547
Total to Date	6553

Verify that the statements made by me on this form are true
 Pilot's Signature: *David Rodriquez*

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Endorsements	Number of Landings	Aircraft Category
20-2	B-727-319	N908JC	LFPB EGFB		131	JC, NICKOL JUNKERMAN	1/1	GLIDER
21	"	"	LFPB LFPB		132	JC, MARCOLE JUNKERMAN	1/1	10
22	"	"	LFPB JFK		133	JC, SK [REDACTED]	1/1	10
23	"	"	JFK PRF		134	JC, FEMALE	1/1	75
24	G-159A	N909TK	TGB TGB		135	JC, ANAHEA, 2 FEMALE	1/1	25
25	G-118JB	"	TGB BGM		136	JC, [REDACTED]	1/1	7
26	"	"	TGB TGB		137	JC, [REDACTED]	1/1	7
27	"	"	TGB DLS		138	JC, [REDACTED]	1/1	9
28	"	"	DLS PAJ		139	JC, SK, RENE FLEISSMAN	1/1	38
29	B-727-319	N-109 SE	LPAZ LPAZ		140	PREVIOUS WELDON J. REEDING, NICKOL JUNKERMAN, CURRY JUNKERMAN, SK, [REDACTED] DAVIS, ANAHEA, MARCOLE JUNKERMAN, BOB ARNOLD, PHILIP SLICK, JIM KENNEDY, GREG MOORE, RONNY JUNKERMAN, FLEISSMAN, WASSILIAN, BOB ARNOLD, [REDACTED]	1/1	6
30	"	"	DGAP DMAP		141	SAME AS ABOVE - LESS RENTABLE	1/1	57
31	"	"	DMAP HR YR		142	SAME AS ABOVE PLUS FROM ANAHEA, DAVIS	1/1	40
32	"	"	HR YR FQMA		143	SAME AS ABOVE	1/1	38
33	"	"	FQMA FACS		144	SAME AS ABOVE	1/1	74
34	"	"	FACS FACS		145	SAME AS ABOVE LESS J.C. GARY, SK, [REDACTED] JUNKERMAN, ANAHEA, MARCOLE JUNKERMAN, BOB ARNOLD, PHILIP SLICK, JIM KENNEDY, GREG MOORE, RONNY JUNKERMAN, FLEISSMAN, WASSILIAN, BOB ARNOLD, [REDACTED]	1/1	20
35	"	"	FACS FACS		146	SAME AS ABOVE	1/1	62
36	"	"	FACS DGAP		147	SAME AS ABOVE	1/1	62
37	"	"	DGAP LFPB		148	SAME AS ABOVE	1/1	62
38	"	"	LFPB LFPB		149	SAME AS ABOVE	1/1	62
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148	"	"	LFPB LFPB		259	SAME AS ABOVE	1/1	62
149	"	"	LFPB LFPB		260	SAME AS ABOVE	1/1	62
150	"	"	LFPB LFPB		261	SAME AS ABOVE	1/1	62
151	"	"	LFPB LFPB		262	SAME AS ABOVE	1/1	62
152	"	"	LFPB LFPB		263	SAME AS ABOVE	1/1	62
153	"	"	LFPB LFPB		264	SAME AS ABOVE	1/1	62
154	"	"	LFPB LFPB		265	SAME AS ABOVE	1/1	62
155	"	"	LFPB LFPB		266	SAME AS ABOVE	1/1	62
156	"	"	LFPB LFPB		267	SAME AS ABOVE	1/1	62
157	"	"	LFPB LFPB		268	SAME AS ABOVE	1/1	62
158	"	"	LFPB LFPB		269	SAME AS ABOVE	1/1	62
159	"	"	LFPB LFPB		270	SAME AS ABOVE	1/1	62
160	"	"	LFPB LFPB		271	SAME AS ABOVE	1/1	62
161	"	"	LFPB LFPB		272	SAME AS ABOVE	1/1	62
162	"	"	LFPB LFPB		273	SAME AS ABOVE	1/1	62
163	"	"	LFPB LFPB		274	SAME AS ABOVE	1/1	62
164	"	"	LFPB LFPB		275	SAME AS ABOVE	1/1	62
165	"	"	LFPB LFPB		276	SAME AS ABOVE	1/1	62
166	"	"	LFPB LFPB		277	SAME AS ABOVE	1/1	62
167	"	"	LFPB LFPB		278	SAME AS ABOVE	1/1	62
168	"	"	LFPB LFPB		279	SAME AS ABOVE	1/1	62
169	"	"	LFPB LFPB		280	SAME AS ABOVE	1/1	62
170	"	"	LFPB LFPB		281	SAME AS ABOVE	1/1	62
171	"	"	LFPB LFPB		282	SAME AS ABOVE	1/1	62
172	"	"	LFPB LFPB		283	SAME AS ABOVE		

Date	Aircraft Make (and Model)	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flights No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category
29	B-27	N4003	LFB		146	2000-05-29	1/1	9
30	"	"	LFB		147	2000-05-30	1/1	9
31	"	"	JFK		148	2000-05-31	1/1	9
32	"	"	JFK		149	2000-06-01	1/1	9
33	"	"	JFK		150	2000-06-02	1/1	9
34	"	"	JFK		151	2000-06-03	1/1	9
35	"	"	JFK		152	2000-06-04	1/1	9
36	"	"	JFK		153	2000-06-05	1/1	9
37	"	"	JFK		154	2000-06-06	1/1	9
38	"	"	JFK		155	2000-06-07	1/1	9
39	"	"	JFK		156	2000-06-08	1/1	9
40	"	"	JFK		157	2000-06-09	1/1	9
41	"	"	JFK		158	2000-06-10	1/1	9
42	"	"	JFK		159	2000-06-11	1/1	9
43	"	"	JFK		160	2000-06-12	1/1	9
44	"	"	JFK		161	2000-06-13	1/1	9
45	"	"	JFK		162	2000-06-14	1/1	9
46	"	"	JFK		163	2000-06-15	1/1	9
47	"	"	JFK		164	2000-06-16	1/1	9
48	"	"	JFK		165	2000-06-17	1/1	9
49	"	"	JFK		166	2000-06-18	1/1	9
50	"	"	JFK		167	2000-06-19	1/1	9
51	"	"	JFK		168	2000-06-20	1/1	9
52	"	"	JFK		169	2000-06-21	1/1	9
53	"	"	JFK		170	2000-06-22	1/1	9
54	"	"	JFK		171	2000-06-23	1/1	9
55	"	"	JFK		172	2000-06-24	1/1	9
56	"	"	JFK		173	2000-06-25	1/1	9
57	"	"	JFK		174	2000-06-26	1/1	9
58	"	"	JFK		175	2000-06-27	1/1	9
59	"	"	JFK		176	2000-06-28	1/1	9
60	"	"	JFK		177	2000-06-29	1/1	9
61	"	"	JFK		178	2000-06-30	1/1	9
62	"	"	JFK		179	2000-07-01	1/1	9
63	"	"	JFK		180	2000-07-02	1/1	9
64	"	"	JFK		181	2000-07-03	1/1	9
65	"	"	JFK		182	2000-07-04	1/1	9
66	"	"	JFK		183	2000-07-05	1/1	9
67	"	"	JFK		184	2000-07-06	1/1	9
68	"	"	JFK		185	2000-07-07	1/1	9
69	"	"	JFK		186	2000-07-08	1/1	9
70	"	"	JFK		187	2000-07-09	1/1	9
71	"	"	JFK		188	2000-07-10	1/1	9
72	"	"	JFK		189	2000-07-11	1/1	9
73	"	"	JFK		190	2000-07-12	1/1	9
74	"	"	JFK		191	2000-07-13	1/1	9
75	"	"	JFK		192	2000-07-14	1/1	9
76	"	"	JFK		193	2000-07-15	1/1	9
77	"	"	JFK		194	2000-07-16	1/1	9
78	"	"	JFK		195	2000-07-17	1/1	9
79	"	"	JFK		196	2000-07-18	1/1	9
80	"	"	JFK		197	2000-07-19	1/1	9
81	"	"	JFK		198	2000-07-20	1/1	9
82	"	"	JFK		199	2000-07-21	1/1	9
83	"	"	JFK		200	2000-07-22	1/1	9
84	"	"	JFK		201	2000-07-23	1/1	9
85	"	"	JFK		202	2000-07-24	1/1	9
86	"	"	JFK		203	2000-07-25	1/1	9
87	"	"	JFK		204	2000-07-26	1/1	9
88	"	"	JFK		205	2000-07-27	1/1	9
89	"	"	JFK		206	2000-07-28	1/1	9
90	"	"	JFK		207	2000-07-29	1/1	9
91	"	"	JFK		208	2000-07-30	1/1	9
92	"	"	JFK		209	2000-07-31	1/1	9
93	"	"	JFK		210	2000-08-01	1/1	9
94	"	"	JFK		211	2000-08-02	1/1	9
95	"	"	JFK		212	2000-08-03	1/1	9
96	"	"	JFK		213	2000-08-04	1/1	9
97	"	"	JFK		214	2000-08-05	1/1	9
98	"	"	JFK		215	2000-08-06	1/1	9
99	"	"	JFK		216	2000-08-07	1/1	9
100	"	"	JFK		217	2000-08-08	1/1	9
101	"	"	JFK		218	2000-08-09	1/1	9
102	"	"	JFK		219	2000-08-10	1/1	9
103	"	"	JFK		220	2000-08-11	1/1	9
104	"	"	JFK		221	2000-08-12	1/1	9
105	"	"	JFK		222	2000-08-13	1/1	9
106	"	"	JFK		223	2000-08-14	1/1	9
107	"	"	JFK		224	2000-08-15	1/1	9
108	"	"	JFK		225	2000-08-16	1/1	9
109	"	"	JFK		226	2000-08-17	1/1	9
110	"	"	JFK		227	2000-08-18	1/1	9
111	"	"	JFK		228	2000-08-19	1/1	9
112	"	"	JFK		229	2000-08-20	1/1	9
113	"	"	JFK		230	2000-08-21	1/1	9
114	"	"	JFK		231	2000-08-22	1/1	9
115	"	"	JFK		232	2000-08-23	1/1	9
116	"	"	JFK		233	2000-08-24	1/1	9
117	"	"	JFK		234	2000-08-25	1/1	9
118	"	"	JFK		235	2000-08-26	1/1	9
119	"	"	JFK		236	2000-08-27	1/1	9
120	"	"	JFK		237	2000-08-28	1/1	9
121	"	"	JFK		238	2000-08-29	1/1	9
122	"	"	JFK		239	2000-08-30	1/1	9
123	"	"	JFK		240	2000-08-31	1/1	9
124	"	"	JFK		241	2000-09-01	1/1	9
125	"	"	JFK		242	2000-09-02	1/1	9
126	"	"	JFK		243	2000-09-03	1/1	9
127	"	"	JFK		244	2000-09-04	1/1	9
128	"	"	JFK		245	2000-09-05	1/1	9
129	"	"	JFK		246	2000-09-06	1/1	9
130	"	"	JFK		247	2000-09-07	1/1	9
131	"	"	JFK		248	2000-09-08	1/1	9
132	"	"	JFK		249	2000-09-09	1/1	9
133	"	"	JFK		250	2000-09-10	1/1	9
134	"	"	JFK		251	2000-09-11	1/1	9
135	"	"	JFK		252	2000-09-12	1/1	9
136	"	"	JFK		253	2000-09-13	1/1	9
137	"	"	JFK		254	2000-09-14	1/1	9
138	"	"	JFK		255	2000-09-15	1/1	9
139	"	"	JFK		256	2000-09-16	1/1	9
140	"	"	JFK		257	2000-09-17	1/1	9
141	"	"	JFK		258	2000-09-18	1/1	9
142	"	"	JFK		259	2000-09-19	1/1	9
143	"	"	JFK		260	2000-09-20	1/1	9
144	"	"	JFK		261	2000-09-21	1/1	9
145	"	"	JFK		262	2000-09-22	1/1	9
146	"	"	JFK		263	2000-09-23	1/1	9
147	"	"	JFK		264	2000-09-24	1/1	9
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151	"	"	JFK		268	2000-09-28	1/1	9
152	"	"	JFK		269	2000-09-29	1/1	9
153	"	"	JFK		270	2000-09-30	1/1	9
154	"	"	JFK		271	2000-10-01	1/1	9
155	"	"	JFK		272	2000-10-02	1/1	9
156	"	"	JFK		273	2000-10-03	1/1	9
157	"	"	JFK		274	2000-10-04	1/1	9
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174	"	"	JFK		291	2000-10-21	1/1	9
175	"	"	JFK		292	2000-10-22	1/1	9
176	"	"	JFK		293	2000-10-23	1/1	9
177	"	"	JFK		294	2000-10-24	1/1	9
178	"	"	JFK		295	2000-10-25	1/1	9
179	"	"	JFK		296	2000-10-26	1/1	9
180	"	"	JFK		297	2000-10-27	1/1	

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

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and PAUL G.
CASSELL,

Plaintiffs,

vs.

ALAN M. DERSHOWITZ,

Defendant.

VIDEOTAPE CONTINUED DEPOSITION OF

ALAN M. DERSHOWITZ

VOLUME 3

Pages 334 through 461

Tuesday, January 12, 2016
9:46 a.m. - 11:59 a.m.

Tripp Scott
110 Southeast 6th Street
Fort Lauderdale, Florida

Stenographically Reported By:
Kimberly Pontalvo, RPR, CLR
Realtime Systems Administrator

www.phippsreporting.com
(888)811-3408

1 Virginia believes she has been hurt by you or Prince
2 Andrew, she should be suing for damages?

3 MR. SCOTT: Objection, form.

4 A. I don't recall.

5 BY MR. EDWARDS:

6 Q. Have you ever said, "I welcome that
7 lawsuit"?

8 MR. SCOTT: Objection, form. You should
9 identify what you're publishing from.

10 MR. EDWARDS: I'm asking if he's ever made
11 the statement to anybody other than his
12 lawyers.

13 A. I know I said that I welcome any
14 opportunity to put [REDACTED] under oath and
15 to have her cross examined to establish that
16 everything she's said about me is totally false,
17 which I'm confident we can do.

18 BY MR. EDWARDS:

19 Q. After making that statement, were you
20 presented by Mr. Scarola, I believe, with a waiver
21 of the statute of limitations in order to oblige you
22 on filing that lawsuit?

23 A. Mr. Scarola wrote me a nasty letter that I
24 didn't think it was appropriate to respond to. What
25 I did do is state under oath that she was lying and

1 state under oath that I did not have sex with her,
2 thereby opening myself up --

3 MR. EDWARDS: This again is nonresponsive
4 to the question.

5 SPECIAL MASTER POZZUOLI: Let me stop --
6 repeat the question so we can get an answer.

7 BY MR. EDWARDS:

8 Q. The question is, were you sent a waiver of
9 the statute of limitations to sign so that Virginia
10 Roberts could bring that lawsuit? Were you?

11 A. I don't believe that's right. I don't
12 believe that's right. I don't believe that I was
13 sent a -- something that would give her the
14 opportunity -- a waiver to file that lawsuit.

15 That's not my recollection. If you show it to me,
16 maybe my recollection will be refreshed.

17 I had talked about the statute of
18 limitations for criminal purpose was what I said,
19 that I would waive the statute of limitations for
20 criminal purposes. If a prosecutor were to
21 investigate this case and come to the conclusion
22 that there was probable cause that I had committed
23 any offense with Virginia Roberts, I would then
24 waive the statute of limitations.

25 Q. Okay.