

ORDER

his mansion for the purpose of sexual exploitation. Substantively, the interrogatories are narrowly tailored to discover only information that is directly relevant to Plaintiff's claims and/or Epstein's defenses. Epstein's HIPAA objections are unfounded as the request seeks only the **identification** of Epstein's health care providers.¹

Interrog

Finally, the requested ten-year time frame is not overly broad considering the allegation that Epstein has a psychosexual condition, which, if true, could very well have existed most, if not all, of his adult life. The Court agrees with Epstein, however, that Plaintiff's allegation of child abuse, does not alone provide Plaintiff with carte blanche access to a list of ALL of Defendant's medical providers. Instead, the undersigned limits the interrogatory to a request for "identification, by name, title and address and/or telephone number, of all of Epstein's psychologists, psychiatrists, therapists, or mental health counselors for the last ten years." Accordingly, except as mentioned above with respect to health care professionals, the Court finds Epstein's objections to Interrogatories 7, 8 and 12 unfounded and orders Epstein to provide responses to same in accordance with the afore-stated terms, within ten (10) days from the date hereof.

Limit # 8

Should be 11

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PRODUCTION REQUESTS

As noted previously, the Fifth Amendment privilege may not apply to specific

¹ In addressing Interrogatory 8, both parties refer to the need for the Court to hold an *in camera* inspection of the documents to determine, as to each document, whether Fla. Stat. §39.204 is applicable. The request at issue, however, is an INTERROGATORY request, not a document request, and therefore these concerns are inapplicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

CASE NO.: 08-CV-80119-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

*Time → 11/03 - present
Paid for #7 + #11*

**AMENDED FIRST SET OF INTERROGATORIES
TO DEFENDANT JEFFREY EPSTEIN**

Plaintiff, JANE DOE No. 2, by and through undersigned counsel, propounds this Amended First Set of Interrogatories upon Defendant, JEFFREY EPSTEIN, pursuant to the Federal Rules of Civil Procedure, to be answered in writing, under oath, within thirty (30) days of the date hereof.

Definitions and Instructions

a. The word "document" shall mean any written or graphic matter or other means of preserving thought or expression, and all tangible things from which information can be processed or transcribed, including, but not limited to correspondence, memoranda, notes, messages, letters, telegrams, teletype messages, bulletins, diaries, chronological data, minutes, books, reports, charts, ledgers, invoices, worksheets, receipts, computer printouts, schedules, affidavits, contracts, transcripts, surveys, graphic representations of any kind, photographs, graphs, microfilm, videotapes, tape recordings, motion pictures or other films. "Document" shall be deemed to include the original and any draft thereof, and any copy of an original or a draft which differs in any respect from such original or draft.

b. The word "person" shall be deemed to mean any natural person or any legal entity including but not limited to the corporation, partnership, and or unincorporated association, and

cc: J4, JE

any officer, director, employee, agent personal representative or other person acting or purporting to act on its behalf.

c. The words "identity" or "identify", when used with reference to a natural person, call for the following information:

i) His or her full name, profession, address, telephone number and email address, or, if such present information is unknown, provide the last known identifying same;

ii) The full name and address of each of his or her employers; and

iii) His or her present position and his or her position at the time of the act to which the Interrogatory answer relates.

d. The words "identity" or "identify", when used with reference to any entity other than a natural person, call for the full name of the entity, the type of entity (department, agency, corporation, partnership, etc.), and the address and telephone number of its principal place of business or operations, its principal business or other activity and its relationship, if any, to the parties to this litigation. If such entity no longer maintains an address, is engaged in business or other activity or bears any relationship to a party to this litigation, state his last known address, activity and/or relationship, and the date(s) thereof.

e. The words "identity" or "identify", when used with reference to a document or a communication, call for the following information:

i. Its nature (i.e., letter, telegram, memorandum, chart, report, canceled check, etc.), date, the signatory, the recipient, and the name and address of each;

ii The identity of each person who signed the document or of each person who participated in the making of the communication;

ii The title or heading of the document or communication, if any.

f. The words "Defendant", "you" or "your" refers to Defendant, Jeffrey Epstein, and any agent, representative, employee or person acting or purporting to act on his behalf.

g. "Employee" shall mean any person employed to perform work or services for Defendant or by Defendant, either directly or indirectly, including without limitation:

i. a limited partnership, corporation, limited liability company, or other company or entity of which Defendant is a member, director, officer or person in control; and

ii. persons employed by a partnership or a subsidiary of a partnership in which Defendant is a general partner or person in control.

h. "Palm Beach Residence" shall mean that certain property located in Palm Beach, Florida, having an address of 358 El Brillo Way, Palm Beach Fl 33480.

i. "New York Residence" shall mean that certain property located in New York, New York having an address of 9 East 71st Street, New York, NY 10021.

j. "New Mexico Residence" shall mean that certain property located in New Mexico having an address of 49 Zorro Ranch Road, Stanley, New Mexico, 87056-9743.

k. "St. Thomas Residence" shall mean that certain property located in St. Thomas having an address of 6100 Red Hook Quarters, Suite B-3, St. Thomas, U.S.V.I., 00807.

l. The time period for the responses to these Interrogatories is January 1, 2003 to present, unless otherwise stated.

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federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is overbroad and seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005."

Interrogatory No. 6. Identify all persons who came to the St. Thomas Residence and who gave a massage or were asked to give a massage to Defendant.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is overbroad and seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005."

Interrogatory No. 7. List all the time periods during which Jeffrey Epstein was present in the State of Florida, including for each the date he arrive and the date he departed.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is overbroad and seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the

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discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for a time period from January 1, 2003 until present.

Interrogatory No. 8. Identify all of Jeffrey Epstein health care providers in the past (10) ten years, including without limitation, psychologists, psychiatrists, mental health counselors, physicians, hospitals and treatment facilities.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is overbroad and seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence. In addition, such information is privileged pursuant to Rule 501, Fed. Evid., and §90.503, Fla.Evid. Code. In addition, such information is protected by the provisions of the Health Insurance Portability and Accountability Act (HIPAA).

Interrogatory No. 9. List all items in Jeffrey Epstein's possession in Palm Beach, Florida, at any time during the period of these interrogatories, which were used or intended to be used as sexual aids, sex toys, massage aids, and/or vibrators, and for each, list the manufacturer, model number (if applicable), and its present location.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is overbroad and seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Amended Complaint alleges a time period of "in or about 2004 - 2005," while Plaintiff's interrogatory seeks information from

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January 1, 2003, until present. Further, the request is meant to embarrass and harass the Defendant.

Interrogatory No. 10. Identify all persons who provide transportation services to Jeffrey Epstein, whether as employees or independent contractors, including without limitation, chauffeurs and aircraft crew.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is overbroad and seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence. Plaintiff places no time limitation.

Interrogatory No. 11. Identify all telephone numbers used by Epstein, including cellular phones and land lines in any of his residences, by stating the complete telephone number and the name of the service provider.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is overbroad and seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's allegations claim a time period of "in or about 2004-2005" and involve Defendant's Palm Beach residence.

Interrogatory No. 12. Identify all telephone numbers of employees of Epstein, used in the course or scope of their employment, including cellular phones and land lines in any of his residences, by stating the complete telephone number and the name of the service provider.