

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-CIV-MARRA/JOHNSON

JANE DOE #1 AND JANE DOE #2,

Plaintiffs,

vs.

UNITED STATES OF AMERICA,

Defendant.

**REPLY IN SUPPORT OF MOTION
FOR LIMITED INTERVENTION BY ALAN M. DERSHOWITZ**

Alan M. Dershowitz hereby replies in support of his Motion for Limited Intervention (DE 282).

Despite doubling and tripling down on her falsehoods about Alan M. Dershowitz (herein, “Prof. Dershowitz”), Jane Doe #3 struggles to justify the vicious smears as having any relevance to the issues in this proceeding. Her Response to Prof. Dershowitz’s Motion for Limited Intervention (DE 291) (herein “Response”) offers no legitimate reason for defaming Prof. Dershowitz in her Joinder Motion, and she has no right to continue to do so in this Court. Strikingly, the Response does not explain why Jane Doe #3, discredited and disbelieved, and with an obvious financial motive for fabrication of salacious accusations, waited almost seven years to lob a bombshell into a proceeding in which she has no right to participate. The Response does not account for why Jane Doe #3 never once asserted her accusations about Prof. Dershowitz until a month ago even though the alleged transgressions supposedly occurred more than twelve years ago. Although neither Jane Doe #3 nor anyone else had previously asserted

any wrongdoing by Prof. Dershowitz, now Jane Doe #3 cynically exploits the yoke of victimhood to cheaply victimize others.

Jane Doe #3's Response is cheap indeed. At bottom, her Response is nothing but a paper-thin pastiche of conspiracy theory and outright misrepresentation that crumbles upon the slightest examination. Invocations of the Fifth Amendment by nonparty witnesses in response to innocuous questions about Prof. Dershowitz are said to take on a "sinister cast"; yet these same witnesses invoked their right against self-incrimination to almost every question asked of them, including their parents' names. Prof. Dershowitz, as Epstein's former legal counsel, is one of hundreds of people listed in an address book purloined by Jeffrey Epstein's butler; yet because Prof. Dershowitz's name is circled in the address book by an unknown person for unknown reasons, the argument is made that Prof. Dershowitz sexually abused a minor. The record shows that while Prof. Dershowitz and Jane Doe #3 are both mentioned in the flight logs of Mr. Epstein's private plane, they are never listed to have been on the same flight; Plaintiffs claim that somehow that Prof. Dershowitz single-handedly orchestrated the destruction of logs without any evidence of ability or possibility to do so. The increasingly hysterical accusations and insults are both sad and ridiculous.

It is precisely this toxic mix of irrelevancy, malicious falsehood, and empty accusation that justifies Prof. Dershowitz's intervention to, at least, strike the allegations against him. Jane Doe #3 never had any need to drag Prof. Dershowitz into this action besides to wrongfully use his good name and international stature to stir up media interest in her filing. This is impertinence, plain and simple, and it has no place in this Court. Prof. Dershowitz therefore urges the Court to either allow him to intervene to strike Jane Doe #3's allegations or deny Jane

Doe #3's Joinder Motion so she is no longer afforded the ability to use the docket of this Court to defame others.

I. Jane Doe #3's Continued Smears of Prof. Dershowitz Demonstrate His Need to Intervene

Jane Doe #3 and her counsel's actions over the past month have confirmed that Prof. Dershowitz's request for intervention stands upon dramatically different circumstances than other intervention motions in this case, or any other case for that matter. Simply put, the scope and tenor of their attacks against Prof. Dershowitz differ both in degree and in kind from other reputational muggings conducted in the case before this Court. Nor is there a single reported decision in federal case law in which the vitriol, severity, and length of the attacks against a nonparty approach those levelled against Prof. Dershowitz here. What has become further apparent is that if Prof. Dershowitz is not allowed to intervene, Jane Doe #3 and her counsel will proceed with their attacks against him, all the more emboldened with complete impunity.

While Jane Doe #3 asks to "prove" her allegations against Prof. Dershowitz, she argues paradoxically that he does not have "any direct interest" in defending these allegations. Instead, she directs Prof. Dershowitz to defend the allegations that she makes in a contrived lawsuit filed by her attorneys against him in Broward County Circuit Court for defamation. Moreover, the law cited by Prof. Dershowitz, including the *Sackman* and *Penthouse* cases, demonstrates a need and entitlement to intervene to vindicate his legitimate reputational interest that no other party is situated to protect. "The individual's right to the protection of his own good name reflects no more than our basic concept of essential dignity and worth of every human being – a concept at the root of any decent system of ordered liberty..." *Krauser v. Evolution Holdings, Inc.*, 975

F.Supp. 2d 1247, 1260 (S.D. Fla. 2013); quoting *Spencer v. Kemna*, 523 U.S. 1, 24 n. 5 (1998) (Stevens, J., dissenting).

In an effort to cite contrary law to the Court, Jane Doe #3's Response takes remarkable liberties in describing what is claimed to be the law to Court. For example, the Response quotes *Calloway v. Westinghouse Elec. Corp.*, 115 F.R.D. 73, 74 (M.D. Ga. 1987) for the proposition that "a witness' interest in his reputation alone . . . does not constitute the required 'interest relating to the property or transaction which is the subject of the present action' necessary to allow intervention as a matter of right." Yet what is excised from that quote through the ellipses is the most crucial part of the case: "following a finding by a court that he is not credible." *Calloway* actually stands for the proposition that a witness cannot intervene in a case as of right if the Court has found him not credible in one of its orders. This finding has never been made as to Prof. Dershowitz either in this Court, or in hundreds of others in which he has appeared.

II. Jane Doe #3's Lies About Prof. Dershowitz Are Wholly Irrelevant to This Action

Meanwhile, Jane Doe #3 fails to come up with a single credible reason for naming Prof. Dershowitz in her Joinder Motion. First, she claims she needed to drag Prof. Dershowitz's name through the mud to prove that Jane Doe #3 was a victim of sexual abuse by Jeffrey Epstein. Yet, in her Joinder Motion, she states that "[t]he Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA." (DE 279 at 6.) If she was already listed as a victim on the NPA, why would they need to prove that further by adding pages of scurrilous allegations against various individuals? And why did they have to mention Prof. Dershowitz by name, when elsewhere they claim that "numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime

Minister, and other world leaders” also committed sexual abuse, but keep those alleged figures anonymous? The bad faith is apparent.

Second, Jane Doe #3 claims that she needed to name Prof. Dershowitz and others in the Joinder Motion because of discovery disputes between the government and Jane Doe #1 and Jane Doe #2. This does not even makes sense, legally or factually. Jane Doe #3’s right to join in this case has nothing to do with Jane Doe #1 and Jane Doe #2’s entitlement to documents in discovery. In fact, the discovery requests that Jane Doe #3 cites to in her Response as purported cover for their sliming of Prof Dershowitz show that their argument is factually bogus. Prof. Dershowitz is mentioned in only two of twenty-five requests for production propounded by Jane Doe #1 and Jane Doe #2. (*See* Jane Doe #1 and Jane Doe #2’s First Request for Production to the Government Regarding Information Relevant to Their Pending Action Concern [sic] the Crime Victims Act, at DE 225-1 at 26-38.) Both requests, nos. 8 and 21 seek his communications with the government in his role as Mr. Epstein’s defense attorney. There is no issue of complicity or knowledge in any misconduct. Moreover, a fact conveniently omitted by Jane Doe #3 is that Prof. Dershowitz is one of eleven lawyers whose communications Jane Doe #1 and Jane Doe #2 sought in the requests for production. As the Court knows, Prof. Dershowitz had no material connection to this case—as to the merits or as to discovery—before he was dragged in by Jane Doe #3.

Third, Jane Doe #3 claims that the smears against Prof. Dershowitz are relevant to show that Prof. Dershowitz had a motive to negotiate “confidentiality” and “blank check” provisions into the NPA entered into between the government and Mr. Epstein. Again, this argument makes no sense in the context of this case. Dershowitz’s involvement in the agreement as one of Epstein’s attorneys, would have nothing to do with the negotiation of that agreement. The

inclusion of certain provisions in the agreement simply has nothing to do with whether the government complied with its obligations under the Crime Victims' Rights Act ("CVRA"). If anything, it is the government's motive that would be at issue—although even that point is doubtful—not the defense attorneys'. Moreover, because the first time Jane Doe #3 made these contemptible allegations against Prof. Dershowitz was in her Motion for Joinder in December 2014, those allegations are irrelevant as to the inquiry of whether Jane Doe #3's rights under the CVRA were violated at the time the NPA was entered. The government confirms that when Jane Doe #3 was contacted by the FBI about this investigation, she clearly "stated that she did not want to be involved in the federal investigation." (DE 290 at 6.) She was not "kept in the dark" as she alleges in her Response. (DE 291 at 25.) Instead, she apparently chose to stay in the dark. Moreover, she did not make any allegations against Prof. Dershowitz at the time the NPA was entered, nor did she made any allegations against Prof. Dershowitz in her action for civil damages in 2009, nor did she make any allegations against Prof. Dershowitz in her tape recorded interview with her attorney in 2011. The first time these allegations surfaced were in connection with Jane Doe #3's Motion for Joinder in this action. The allegations have absolutely no relevance to the underlying issue of whether Jane Doe #3 was "treated with fairness" when the NPA was entered, as the allegations against Prof. Dershowitz did not surface until approximately eight years later.

Fourth, Jane Doe #3 then makes the facially absurd and libelous claim that somehow Prof. Dershowitz benefited by the "co-conspirators" clause of the NPA. But the link between the need to include these allegations and their ability to rescind the "co-conspirators" clause goes completely unexplained. The allegations are completely gratuitous, as there is no such link. No such claim existed until fabricated by Jane Doe #3 many years after the NPA was signed and

fully performed. Additionally, as stated in Prof. Dershowitz's Supplement to his Motion for Limited Intervention, this "co-conspirator" provision "was intended to apply to four alleged co-conspirators, who were named in the original NPA and later redacted at their request.... Alan Dershowitz was never alleged to be a potential co-conspirator." (DE 285 at 4.)

Incredibly, Jane Doe #3's counsel, Bradley Edwards, agreed with this reading of the NPA in his Statement of Undisputed Fact during his own personal lawsuit against Jeffrey Epstein (*Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards*, lawsuit (Case no. 502009-CA-040800) in Palm Beach County Circuit Court. There, Edwards explained that these co-conspirators were certain individuals who "procured minor females to be molested by Epstein." (DE 291-15 at ¶ 27.) In fact, Edwards stated that "One of the co-conspirators – ██████████ ██████████ – even participated in the sex acts with minors (including E.W.) and Epstein." (Id.) Only now, when convenient as a way to try to justify allegations against Prof. Dershowitz does Edwards argue that the "co-conspirator" provision was actually intended to protect Prof. Dershowitz.

Fifth, Jane Doe #3 claims that she needed to include Prof. Dershowitz in her filing because her CVRA claim of "unfair" treatment "implicates a fact-sensitive equitable defense which must be considered in the factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims." The "facts" to which this "defense" is sensitive, even if Jane Doe #3 is allowed to intervene, are the interactions between the prosecutors and Jane Doe #3, and not anything pertinent to Prof. Dershowitz personally. Nor are attorney-client communications between Epstein and his counsel at issue, or the proper subject of discovery in this action under any scenario.

III. Jane Doe #3's Efforts to Bolster Her Lies About Prof. Dershowitz Are Remarkably Thin

Setting aside the utter irrelevancy of the allegations against Prof. Dershowitz, having created an international imbroglio by their ill-conceived libels of Prof. Dershowitz, one would expect that Jane Doe #3 would be able to muster at least some credible support for their allegations. Yet the two “incontestable” facts she leads with in support of her claim that Prof. Dershowitz is a serial sex abuser are (1) that Mr. Epstein and Prof. Dershowitz were friends; and (2) Prof. Dershowitz visited Mr. Epstein’s house. Of course, these supposedly “incontestable” facts are evidence of nothing.

To further illuminate their patent ridiculousness, the Court needs only to read some of the deposition testimony of Mr. Epstein’s household employee that is attached to but not discussed in the Response. Juan Alessi, the employee, testified that Mr. Epstein once hosted an elderly Nobel Prize winning scientist or mathematician at his house. (DE 291-17 at 6.) On another occasion he hosted a lunch at his house to honor Nobel Prize winners. (*Id.*) Under Jane Doe #3 and her counsel’s logic, these men and women must not only be aware of alleged wrongdoing, they must also be complicit.

Indeed, while the points raised above show a completely lack of investigation into the scurrilous allegations, what is most remarkable about Jane Doe #3 Response is what it omits. Approximately eight years ago, Jane Doe #3 participated in the authorities’ investigation of Mr. Epstein, and received a financial settlement from him. Yet she apparently never once mentioned Prof. Dershowitz’s now supposedly systematic sexual abuse of her to the prosecutors or to her own lawyer. No explanation is given for this monumental inconsistency. Nor, despite his supposed status as a co-conspirator in a scheme to cover up an underage sex abuse ring, is there

any explanation given for the fact that Prof. Dershowitz was never even investigated—or even mentioned—as a potential suspect. Meanwhile the present case has been proceeding for the last seven years, but no explanation has been given for the timing of Jane Doe #3’s effort to join this case only last month.

IV. Prof. Dershowitz Immediately Responded to Jane Doe #3’s Allegations Against Him by Asking to Defend his Reputation

Jane Doe #3 also argues that Prof. Dershowitz should not be allowed to intervene because “he has declined to defend his reputation in other actions.” (DE 279, at 12.) It is without question, however, that the Motion for Joinder filed by Jane Doe #3 on December 30, 2014 (DE 279), was the *first time* anyone has *ever* alleged that Prof. Dershowitz had any sexual contact with a minor. It necessarily follows that this is the *first opportunity* Prof. Dershowitz has had to defend his reputation related to “his involvement in Epstein’s offenses.” In fact, just six days after these venomous and allegations were made, Prof. Dershowitz filed his Motion for Limited Intervention. (DE 282.)

More specifically, Jane Doe #3 argues that when the civil lawsuit was brought by “one of the underage females” against Epstein in 2009 (*Doe v. Epstein*, No. 9:08-80893-KAM (S.D. Fla.)), “Dershowitz understood that counsel for many of Epstein’s victims believed that mounting evidence pointed toward his role extending beyond merely being an attorney for Epstein.” (DE 279 at 13.) Despite this rank and self-serving speculation about what Prof. Dershowitz “understood,” there is not one piece of evidence which points to any allegations that he engaged in any sexual contact with any minor, or even observed any criminal activity, prior to the December 30, 2014 Motion for Joinder. Instead, the deposition testimony which Jane Doe #3 points to simply states that Prof. Dershowitz – who was Jeffrey Epstein’s attorney – visited

Epstein's home (Deposition Testimony of Alfredo Rodriguez at 199, 278, 279, DE 291-18, herein, "Rodriguez Depo. Tr.") Rodriguez specifically testified that he has *no idea whether Prof. Dershowitz had any contact at all with any female.*

Q. And did you have any knowledge of why [Dershowitz] was visiting there?

A. No ma'am.

...

Q. And do you have any idea whether or not Mr. Dershowitz was also receiving massages?

A. I don't know, Ma'am.

...

Q. As to whether any of those women were ever associated with Mr. Dershowitz would it be a correct statement that you have absolutely no knowledge?

A. I don't know, sir.

...

Q. Okay. Were you in any way attempting in your response to Ms. Ezell to imply that Mr. Dershowitz had a massage by one of these young ladies?

A. I don't know, sir.

Q. You have no knowledge?

A. No, sir.

(Rodriguez Depo. Tr. at 279, 280, 385, 386.) To be sure, Rodriguez does testify that Prof. Dershowitz was at Epstein's home when underage females were present at the home – an allegation which Dershowitz strenuously denies. However, *Rodriguez did not testify that Prof. Dershowitz saw, interacted with, or touched any of these females.* Instead, when asked what Prof. Dershowitz did "while those girls were at the house," Rodriguez answered "He will read a book with a glass of wine by the pool, stay inside." (Id. at 426, 427.) When asked if Prof. Dershowitz ever even spoke to any of the girls, or "even knew that they were there" Rodriguez answered "I don't know." (Id. at 427.)

Jane Doe #3 also relies upon the September 8, 2009 deposition testimony of Mr. Juan Alessi to "corroborate" Jane Doe #3's sensational and false allegations regarding Prof. Dershowitz. However, a more complete examination of that testimony reveals that *Alessi did not*

make any allegations of any wrong doing by Dershowitz. (See, DE 291-17, hereinafter “Alessi Depo. Tr.”) Alessi testified that he saw “many celebrities” at the house, including certain senators, Prince Andrew, Princess Sarah, Miss Yugoslavia, Miss Germany, “a lot of queens and other famous people...[including] a very famous lawyer[] that I’m sure you know, Alan Dershowitz, who spend [sic] at the house a couple times.” (Alessi Depo. Tr. 70.) Alessi testified that he also saw other celebrities including Robert Kennedy Junior, Frederick Fekkai, and even various Noble Prize winners at the house. (Id. at 71.) However, Alessi made no allegations of improprieties against any of these individuals. Jane Doe #3 asks the Court to infer that because Prof. Dershowitz was at his client’s home, he must have participated in nefarious activities. At most, Alessi testified that Prof. Dershowitz visited Epstein’s home and received a massage from an adult massage therapist, which “was a treat for everybody” at the Epstein home. (Id. at 74) (“Q. Did [Dershowitz] have massages sometimes when he was there? A. Yes. A massage was like a treat for everybody. If they want it, we call the massage and they have a massage.”) Alessi explains that he was referring to massages performed by adult massage therapists. (Id. at 184) (“Q. All right. And if I understood your testimony is, the ones the – that is, of the massage therapists as you’ve just described [a hundred, 200 different massage therapists], you saw some men? A. Yes. Q. You saw more women? A. Yes. Q. ***And all of the women, at least from your viewpoint, were 18, 19 or older? A. Yes.***”)

Messrs. Alessi and Rodriguez did not allege that Prof. Dershowitz received a massage from any underage females, had any physical contact whatsoever with any underage females, or witnessed anyone engaging in any inappropriate behavior with any underage females. Additionally, despite their allegations to the contrary, it is clear that previous testimony from

Rodriguez and Alessi does not corroborate Jane Doe #3's baseless and utterly false affidavit. (DE 291-1.)

Next, Jane Doe #3 claims that Prof. Dershowitz declined to defend his reputation in the *Edwards v. Epstein* lawsuit (Case no. 502009-CA-040800) in Palm Beach County Circuit Court. (Opp. to Mtn. to Intervene at 13.) In support of this allegation, Jane Doe #3 argues that her attorney in the instant matter, Bradley Edwards contacted Prof. Dershowitz (through his attorney Jack Scarola) to seek his voluntary cooperation in answering questions about Prof. Dershowitz's client, Jeffrey Epstein's conduct. Prof. Dershowitz responded by letter stating

As you may know, I was Jeffrey Epstein's attorney when he submitted his guilty plea. Accordingly, "any knowledge" I may have in connection with that plea is privileged information. If you would let me know what non-privileged information you would seek from me, I would then be able to decide whether to cooperate.

(DE 291-11.) Edwards' attorney responded by stating that based on "sworn testimony and private interviews" he had "placed [Dershowitz] in the presence of Jeffrey Epstein on multiple occasions... when Jeffrey Epstein was in the company of underage females subsequently identified as victims." (DE 291 at 13, 14.) Again, no allegations were made at that time by Edwards' attorney, or by anyone else, that Prof. Dershowitz engaged in any inappropriate conduct or witnessed any inappropriate conduct related to Jeffrey Epstein and underage females. Instead, Edwards was incorrectly seeking Prof. Dershowitz's cooperation for a civil suit between Dershowitz's client, Jeffrey Epstein, and Edwards himself. Remarkably, because Prof. Dershowitz did not agree to compromise his ethical obligations to his client, by voluntarily cooperating with Epstein's adversaries, Jane Doe #3 argues that Prof. Dershowitz should not be allowed to intervene in this action¹.

¹ Jane Doe #3's argument that he has not yet scheduled his deposition in this case, or the recently

It is clear from the record, however, that Prof. Dershowitz acted immediately to defend himself the first time any such allegations were made against him. In fact, just six days after Jane Doe #3 filed her Motion for Joinder, which included vicious allegations against him, Prof. Dershowitz filed his Motion for Limited Intervention. (DE 282.) Prof. Dershowitz should be permitted to intervene for the limited purposes of moving to strike these outrageous and impertinent allegations and to request a show cause order to the attorneys that have made them.

V. Jane Doe #3's Reliance on Other's Invocation of the Fifth Amendment is Improper and Wholly Unpersuasive

Without a shred of physical evidence or witness corroboration for Jane Doe #3's fantasies, she relies on invocations of the Fifth Amendment by Epstein as supportive of an adverse inference as to Prof. Dershowitz. Given that Epstein was taking the Fifth Amendment on all questions, and would have responded in the same way had the opposite questions been asked, there is no inference against Prof. Dershowitz to be made from the invocation of the Fifth Amendment by Epstein. Epstein's interest – in declining to answer any questions whatsoever – was his own personal interest, not that of his lawyers, and lacks even minimal relevance. *Coquina Investments v. TD Bank, N.A.*, 760 F.3d 1300, 1310-11 (11th Cir. 2014)(adverse inferences from the fifth amendment invocation by third parties allowed only where inference is “trustworthy under all of the circumstances” including relationship, shared interest and control); *Kontos v. Kontos*, 968 F.Supp. 400, 407-408 (1997)(no adverse inference allowed from invocation of Fifth Amendment by sister of civil defendant in absence of “identity of interests”); *Sebastian v. City of Chicago*, 2008 WL 2875255 *33-34 (N.D. Ill. 2008)(no adverse inference

filed defamation action, is of no moment. At the appropriate time, Prof. Dershowitz will of course, appear for his deposition and testify that Jane Doe #3's allegations as to him are entirely false. This, however, has no bearing as to whether the Court should permit the limited intervention Prof. Dershowitz seeks.

from invocation of Fifth Amendment in absence of close family or business relationship)². Similarly, any other witnesses taking the Fifth Amendment and remain silent to protect themselves, are obviously, not creating any kind of evidence against Prof. Dershowitz.

Conclusion

In conclusion, if the Court grants Jane Does #3 and #4 motion for joinder (DE 279), then Prof. Dershowitz's motion for limited intervention must be granted for such purposes as may be appropriate including submitting a motion to strike and requesting an order to show cause, so as to give him an opportunity to defend himself against harmful, spiteful and false allegations of the worse kind. If the Court rejects the pending motion for joinder, then the Court should strike the scurrilous allegations against Dershowitz, or, alternatively, determine the possible mootness of his Motion for Limited Intervention.

Respectfully submitted,

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² The fact is that this controversy is not a swearing contest between two equally credible witnesses. On one hand, Prof. Dershowitz is a world-renowned lawyer, professor, and author with an impeccable personal and professional reputation. On the other, Jane Doe #3, who comes into this case with no legitimate explanation for her delay in levelling these accusations against Prof. Dershowitz, has obvious motives to seek financial gain. Her lack of credibility has persisted over the years. When she previously made rape allegations against others, she was deemed not credible by the State Attorney's Office in Palm Beach County., which declined to bring a rape case as alleged by Jane Doe #3 "due to [her] lack of credibility and no substantial likelihood of success at trial." Palm Beach Co. Sheriff's Office Offense Report, Case No. 98041883 at 19 (Feb. 28, 1998).

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-and-

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by Notice of Electronic Filing generated by CM/ECF, on this ____ day of January, 2015, on all counsel or parties of record on the Service List below.

*/s/ Kendall Coffey*_____

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