

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE No. 08-80736-CIV-MARRA/JOHNSON

JANE DOE 1 and JANE DOE 2,  
Plaintiffs,

v.  
UNITED STATES OF AMERICA,  
Defendant.

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**SUPPLEMENTAL BRIEFING IN SUPPORT OF  
MOTION TO INTERVENE OF ROY BLACK,  
MARTIN WEINBERG, AND JAY LEFKOWITZ**

During the hearing on August 12, 2011, the Court directed the proposed intervenors to file additional briefing on their argument that plea negotiations are privileged and not subject to discovery or use as evidence in these proceedings. Proposed intervenors submit the following memorandum of law, which is identical to Part II of the memorandum of law submitted by proposed intervenor Jeffrey Epstein in support of his motion for a protective order and his opposition to the motions of the plaintiffs for production, use, and disclosure of his plea negotiations. If allowed to intervene, the lawyers would then incorporate this argument into their motion for a protective order, which was attached to their motion to intervene.

CUT AND PASTE HERE PART II OF JEFFREY'S MEMO