

#281849/clw

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDACASE NO.: 08-CV-80811-CIV-
MARRA/JOHNSON

[REDACTED],

Plaintiff(s),

vs.

JEFFREY EPSTEIN and [REDACTED],

Defendant(s).

PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST REQUEST TO PRODUCE

Plaintiff, [REDACTED], by and through the undersigned attorneys and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby responds to Defendant, Jeffrey Epstein's, Request to Produce dated January 16, 2009 as follows:

Request to Produce

1. Individual and/or joint income tax returns and supporting documentation including W-2 and 1099 forms for 2002-2007 and, as well as all records or documentation relative to the Plaintiff's earnings for the current year.

ANSWER

Objection. Irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible information

2. All bills/expenses from any medical doctor, chiropractor, psychologists, psychiatrists, mental health counselors (including any members of the healing arts and related fields, i.e. drugs, prescriptions, etc.) you claim you incurred as a result of the injuries which are or may be the subject matter of this lawsuit.

ANSWER

None in our possession. These will be provided upon receipt. Discovery is ongoing.

3. All bills and/or invoices relating to any other expenses that you claim you have incurred as a result of the incident(s) alleged in your action.

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ANSWER

None. Discovery is ongoing.

4. All reports, evaluations, recommendations and/or analysis submitted by any expert which relate to or cover the incident which is the subject matter of this lawsuit and/or any injuries, damages or losses you allege were caused by the incident.

ANSWER

Any reports generated by any retained experts not yet disclosed are protected by the work product privilege. Notwithstanding same, none.

5. All medical reports and/or records from doctors, physicians, (including psychologists, psychiatrists, mental health counselors), hospitals, drug or alcohol facilities or any other person or entity who has rendered treatment to or examined you for any reason after the incident(s) which is the subject matter of this lawsuit.

ANSWER

None in our possession. Discovery is ongoing.

6. All documents including writings, recordings, memorandums, notes, depositions, and all other materials reflecting statements made by the Defendant, Mr. Epstein.

ANSWER

Please see attached Probable Cause Affidavit.

7. Legible copies of the front and back of any and all insurance identification cards, union employment identification cards which would depict the name, address, policy number, claim number, identification number of any insurance companies and/or employers which may provide you with any benefits to compensate you for any of the damages that you are alleging as a result of the incident(s), which is the subject matter of this lawsuit.

ANSWER

None

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8. All statements taken of any individual who is or may be a witness (written or recorded) as a result of the incident(s) which is the subject matter of this lawsuit.

ANSWER

Please see attached Probable Cause Affidavit.

9. All documents reflecting or evidencing payments which you allege were made to you or on your behalf directly or indirectly by Mr. Epstein.

ANSWER

None

10. All photographs, movies, dvds, and videotapes in which you performed sexual acts or simulated sexual acts.

ANSWER

Objection, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding same, none.

11. All photographs, movies, dvds, and videotapes in which you performed sexual acts or simulated sexual acts in exchange for money or other consideration.

ANSWER

Objection, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding same, none.

12. All statements made by you to the police, FBI, or anyone else other than your attorney regarding any matter associated with your complaint.

ANSWER

None in our possession. Discovery is ongoing.

13. All statements, either recorded or written, and in the custody of the Plaintiff or the Plaintiffs attorney, made by persons who have knowledge concerning the subject matter of Plaintiffs lawsuit.

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ANSWER

Please see attached Probable Cause Affidavit

14. All photographs and pictures (by phone, camera or other device) taken of Mr. Epstein or Mr. Epstein's home.

ANSWER

None in our possession.

15. Any diary, log, memo pad, calendar or other writing electronically stored document reflecting the date or dates you were at the home of Mr. Epstein in Palm Beach.

ANSWER

None in our possession. Discovery is ongoing.

16. Any diary or document wherein you wrote or recorded what occurred at Mr. Epstein's home when you went there.

ANSWER

None.

17. All documents reflecting the names and addresses of other individuals with whom you have had sexual activity from January 1, 2000 December 31, 2005.

ANSWER

Objection, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding same, none.

18. All documents reflecting the names and addresses of other individuals with whom you have had sexual activity from January 1, 2006 through November 30, 2008.

ANSWER

Objection, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding same, none.

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19. A current (2008) photograph of you.

ANSWER

Please see attached photograph.

20. Originals and copies of all documents (including electronic information) given by you to the FBI or U.S. Attorney's Office.

ANSWER

None. Discovery is ongoing.

21. Originals and copies of all documents (including electronic information) received by you from the FBI or U.S. Attorney's Office.

ANSWER

See attached Victim Notification.

22. All computers which you have used from 2002 through the current date.

ANSWER

I have not owned a computer from 2002 until the present.

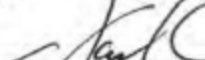
23. All entertainment registrations or licenses issued by any governmental authority or obtained by you for purposes of dancing or working in the adult entertainment business.

ANSWER

None

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I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to all Counsel on the attached list, this 13th day of February, 2009.


 Jack Scarola
 Florida Bar No.: [REDACTED]
 Jack P. Hill
 Florida Bar No.: [REDACTED]
 Searcy Denney Scarola Barnhart & Shipley, P.A.
 [REDACTED]
 [REDACTED]
 Phone: [REDACTED]
 Fax: [REDACTED]
 Attorney for Plaintiff(s)

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