


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80811-CIV-MARRA/JOHNSON


Plaintiff,


vs.

JEFFREY EPSTEIN and 
Defendants.PLAINTIFF'S SUPPLEMENTAL RESPONSE TO DEFENDANT'S FIRST REQUEST
TO PRODUCE DATED JANUARY 16, 2009


Plaintiff , by and through the undersigned attorney and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby supplements her response to Defendant, JEFFREY EPSTEIN's, First Request to Produce dated January 16, 2009 as follows:

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 Plaintiffs earnings for the current year.

ANSWER:

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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:

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

ANSWER:

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:

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:



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:

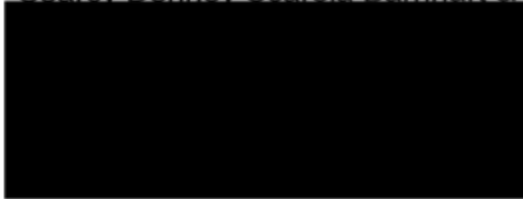


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I HEREBY CERTIFY that a true and correct copy of the foregoing has been
furnished by e-mail to all Counsel on the attached list, this 3rd day of
December, 2009.



Jack P. Hill
Florida Bar No.: 0547808
Searcy Denney Scarola Barnhart & Shipley, P.A.



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