

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY
FLORIDA

STATE OF FLORIDA

CASE NO: 2006 CF 009454 A

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.

MOTION FOR PROTECTIVE ORDER

Jane Doe No. 1 ("Jane Doe"), by and through her mother and natural guardian, hereby files this Motion for Protective Order. As grounds for said motion, Jane Doe states as follows:

1. On July 19, 2006 the State of Florida filed a criminal Indictment against Jeffrey Epstein ("Epstein").
2. Jane Doe, a victim of Epstein's actions, recently filed a civil lawsuit against Epstein. The complaint alleges among other things that Epstein has a sexual preference and obsession for underage minor girls. That he engaged in a scheme in which he gained access to minor girls in his home, sexually assaulted these girls, and then gave them money. Jane Doe was one of Epstein's victims. She was lured into Epstein's Palm Beach home under false pretenses and was sexually assaulted by Epstein. As a result, Jane Doe suffered injuries, including intentional infliction of emotional distress damages.

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3. After the filing of the civil lawsuit and during the week of January 25, 2008, Epstein's criminal attorney, Jack Goldberger, Esq., contacted the undersigned to advise that he wished to take the deposition, in the criminal matter, of Jane Doe on February 6, 2008. The undersigned informed Mr. Goldberger that he would accept service on behalf of Jane Doe, but was not available on February 6, 2008. Counsel agreed to use best efforts to schedule the deposition at a mutually convenient date and time.

4. Despite these assurances and understanding, on Friday evening, February 1, 2008, Epstein's process server served Jane Doe at her place of work for a deposition scheduled to take place on February 6, 2008.¹ See Subpeona attached as Exhibit "A" (Jane Doe's real name has been redacted from the exhibit).

5. The undersigned was forced to call Mr. Goldberger on Friday evening and remind him of our earlier conversation and agreement and to insist that the deposition be re-noticed.²

6. After the conversation of Friday evening and with the expressed assurances that the undersigned would accept service for Jane Doe, two days later on Monday morning February 4, 2008, Mr. Goldberger had a process server serve Jane Doe's mother who resides out of state in Waleska, Georgia. See Subpoena attached as Exhibit "B" (Jane Doe's mother's name has been redacted from the exhibit).

7. The service of process on Jane Doe's mother was defective as an Out of State Commissioner was never appointed and no order was issued by this court authorizing such service. Additionally, Mr. Goldberger had been told not once, but twice that the undersigned would accept service on behalf of Jane Doe, yet despite this Epstein and/or his attorney has insisted on

¹ Mr. Goldberger unilaterally set Jane Doe's deposition for February 6, 2008 despite knowing that the undersigned was not available on that date.

² Mr. Goldberger has now agreed to postpone the deposition.

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having the victim's privacy repeatedly intruded upon by process servers seeking her out at her employment and then again, intruding upon her mother.

8. Additionally, during this same time period yet another adult male came to Jane Doe's employment and represented himself as an "attorney" who needed to contract her. Upon information and belief that person was also an agent of Mr. Epstein's.

9. It can only be concluded that Epstein and/or his counsel are purposefully attempting to harass Jane Doe and her mother. These actions are nothing more than a continuous insult to injury upon a young girl who has already been emotionally scarred for life.

WHEREFORE, Jane Doe, by and through Jane Doe's mother and natural guardian, hereby move the Court for a Protective Order prohibiting Jeffrey Epstein and/or his counsel from continuous and systematic harassment.

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by Facsimile and U. S. Mail, postage prepaid, this 5 day of February 2008 to all counsel on the attached service list.

Respectfully submitted,

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