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~~Richard Stevenson~~
 State Attorney's Office
 401 N. Dixie Hwy
 West Palm Beach, FL 33401
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CONFIDENTIAL

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

CASE NO. 2008CF009381A
DIVISION W

STATE OF FLORIDA

vs.

JEFFREY EPSTEIN,

Defendant.

MOTION TO MAKE COURT RECORDS CONFIDENTIAL

Comes now the Defendant, JEFFREY EPSTEIN, by and through his undersigned attorney's, pursuant to Florida Rule of Judicial Administration 2.420 and the Administrative Orders of this Court , specifically AO 2.303 and moves this Court to treat as confidential the following records.

- A. A document referred to as "Non-Prosecution Agreement" filed under seal in the court file on July 2, 2008.
- B. A document referred to as "The Addendum to the Non-Prosecution Agreement" filed under seal in the court file on August 25, 2008.
- 1. The above referenced documents were Ordered Sealed at a hearing held before the Honorable Judge Deborah Dale Pucillo on June 30, 2008.
- 2. A Motion to Vacate Order Sealing Records and Unseal Records was filed by Non-Party EW on or about May 15, 2009.
- 3. A Motion to Intervene and Petition for Access was filed by Non-party Palm Beach Post on June 1, 2009.
- 4. This Court granted Non-Party E.W. and Palm Beach Post Motion to Intervene on June 10, 2009 but took no immediate action on E. W.'s Motion to Vacate Order Sealing Records and Unsealing Records or on Palm Beach Posts Petition For Access, pending a further hearing.

5.. The documents should remain confidential for the following reasons:

- a. To prevent a serious imminent threat to the fair, impartial, and orderly administration of justice.
- b. To protect a compelling government interest.
- c. To avoid substantial injury to innocent third parties.
- d. To avoid substantial injury to a party by disclosure of matters protected by a common law and privacy right, not generally inherent in these specific type of proceedings, sought to be closed.

WHEREFORE, Defendant moves this Honorable Court to enter an Order keeping the above referenced records confidential, and maintaining them under seal.

I HEREBY CERTIFY that this motion is made in good faith and supported by a sound and factual legal basis.



JACK A. GOLDBERGER, ESQ.

WITNESS my hand and seal in the County and State last aforesaid this 11 day of June, 2009.






Notary Public State of Florida
My Commission Expires


CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via ☒ U.S. Mail; ☒ Facsimile; ☐ Overnight Delivery to R. Alexander Acosta, United States Attorney's Office-Southern District, 500 S. Australian Ave., Suite 400, West Palm Beach, FL 33401, Judith Stevenson Areo, Esq., State Attorney's Office-West Palm Beach, 401 North Dixie Highway, West Palm Beach, FL 33401, William J Berger, Esq., ROTHSTEIN ROSENFELDT ADLER, 401 East Las Olas Blvd., Suite 1650, Fort Lauderdale, FL 33394; Bradley J. Edwards, Esq., ROTHSTEIN ROSENFELDT ADLER, 401 East Las Olas Blvd., Suite 1650, Fort Lauderdale, FL 33394; Deanna K. Shullman, 400 North Ashley Drive, Suite 1100, P.O.Box 2602 (33601) Tampa, FL 33602, Robert D. Critton, BURMAN, CRITTON, LUTTIER, & COLEMAN, 515 N. Flagler Dr. Suite 400, West Palm Beach, Florida 33401. this 11 day of June, 2009.

BURMAN, CRITTON, LUTTIER & COLEMAN
515 N. Flagler Dr. Suite 400
West Palm Beach, Florida 33401
561-842-2820

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ROBERT D. CRITTON, ESQ.
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Florida Bar No. 262013



ATTERBURY, GOLDBERGER & WEISS, P.A.

JOSEPH R. ATTERBURY

JACK A. GOLDBERGER

JASON S. WEISS

Board Certified Criminal Trial Attorney

Member of New Jersey & Florida Bars

June 11, 2009

Honorable Jeffrey Colbath
Palm Beach County Courthouse
205 North Dixie Highway
West Palm Beach, Florida 33401

RE: State of Florida v. Jeffrey Epstein
Case No. 2008 CF009381A

Dear Judge Colbath,

Enclosed please find a courtesy copy of Jeffrey Epstein's Motion to Make Court Records
Confidential filed with the Clerk of the Court on June 11, 2009.

Very truly yours,

Jack A. Goldberger, Esq.

JAG/cg

Enc.

cc: Alexander Acosta, U.S. Attorney
Judith Stevenson Arco, State Attorney
William Berger, Esq.
Bradley Edwards, Esq.
Deanna Shullman, Esq.
Robert Critton, Esq.

09/12/2019

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Agency to Agency Request: 19-411

One Clearlake Centre, Suite 1400, 2595 US Highway 1 South, West Palm Beach, FL 33401

CONFIDENTIAL

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EFTA02729615

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CRIMINAL DIVISION

STATE OF FLORIDA,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NOs.: 2006-CF9454 AXX
2008-CF9381 AXX

RE-NOTICE OF HEARING

This cancels 5.29.09 hearing and reschedules it to 6.10.09
(10 minutes)

To: U.S. Attorney – A. Marie Villafana
Asst. State Attorney – Division W
Jack Goldberger, Esq.

YOU ARE HEREBY NOTIFIED that the undersigned has called up for hearing the
following: **Non Party E.W.'s Motion to Vacate Order Sealing Records and Unseal
Records**

DATE: Wednesday, June 10, 2009
TIME: 10:30 A.M.
JUDGE: The Honorable Jeffrey J. Colbath
PLACE: Palm Beach County Courthouse, Room 11F
205 North Dixie Highway, West Palm Beach, FL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
via U.S. Mail and Facsimile this 28th day of May, 2009 to: A. Marie Villafana, Asst. U.S.
Attorney, 500 S. Australian Ave., Suite 400, West Palm Beach, FL 33401 (561) 820-8777;
Jack Alan Goldberger, Esq., Atterbury Goldberger et al., 250 Australian Ave. South, Suite

09/12/2019

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Agency to Agency Request: 19-411

CONFIDENTIAL

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Case No. 502008CA028058XXXXMB AD

1400, West Palm Beach, FL 33401 (561) 835-8691 and Asst. State Atty, Division W, 401
N. Dixie Highway, West Palm Beach, FL 33401.

ROTHSTEIN ROSENFELDT ADLER
Attorneys for E.W.
401 East Las Olas Blvd., Suite 1650
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By:



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Copies Furnished to:

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