

Pldg 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA-JOHNSON

JANE DOE NO. 2,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES

Plaintiff, JANE DOE 2, by and through her undersigned counsel, and pursuant to Federal Rules of Civil Procedure Rule 33, hereby responds to Defendant, JEFFREY EPSTEIN'S First Set of Interrogatories to Plaintiff as follows:

General Objections

1. Plaintiff objects to Defendant's Interrogatories to the extent that the Interrogatories call for the disclosure of information protected by the attorney-client privilege, attorney work-product doctrine, or other applicable privilege or immunity, whether created by statute or common law. Plaintiff claims such privileges and protections to the extent implicated by each Interrogatory, and excludes privileged and protected information from any responses to Defendant's discovery. Any disclosure is inadvertent and is not intended to waive those privileges or protections, which are specifically reserved.

2. Plaintiff objects to Defendant's Interrogatories to the extent that same are vague, ambiguous, incomprehensible and/or overly broad.

"A"

cc: J.E., J.G., J.R.
close

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9. Describe each injury (physical, emotional, mental) for which you are claiming damages in this case, specifying the part of your body that was injured, the nature of the injury, and as to any injuries you contend are permanent, the effects on you that you claim are permanent.

Answer:

Plaintiff has suffered severe psychological and emotional injuries, including without limitation, anxiety, low self-esteem, feelings of guilt, self-blame, distrustfulness, burdened often by sadness and depression, suicidal thoughts, difficulty trusting others (particularly men), irritability, anger, feeling helpless and powerless, escapism through excessive partying, lack of confidence, loss of innocence.

Plaintiff's psychological and emotional injuries will be analyzed by a forensic expert, whose opinions and related information will be disclosed in accordance with the expert discovery rules of the Federal Rules of Civil Procedure. Plaintiff reserves the right to supplement this response in accordance with the Federal Rules of Civil Procedure.

10. Please state each item of damage that you claim, and include in your answer: the count to which the item of damages relates; the factual basis for each item of damages; and an explanation of how you computed each item of damages, including any mathematical formula used.

Answer:

Plaintiff objects to this interrogatory as calling for an expert opinion and calculation. Subject to said objection, Plaintiff states that she seeks damages arising from her psychological and emotional injuries. These damages include pain and suffering, costs of psychological care and treatment, and loss of earning capacity. The pecuniary elements of these damages will be analyzed and computed by an appropriate expert.

11. List the names and business addresses of each physician (including psychiatrist, psychologist, etc.) or medical provider (including chiropractors) who has treated or examined you, and each medical facility where you have received any treatment or examination for the injuries for which you seek damages in this

VERIFICATION

[REDACTED] being duly sworn, deposes and says that the foregoing answers to interrogatories are true and correct to the best of her knowledge, information and belief.

[REDACTED]

STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

[REDACTED] SWORN TO AND SUBSCRIBED before me this 17 day of January, 2009 by [REDACTED], who is personally known to me or has produced the following identification Florida D.L. which is current or has been issued within the past five years and bears a serial or other identifying number.

Evelyn G. Goens
Print Name

Evelyn G. Goens
Signature

NOTARY PUBLIC - STATE OF FLORIDA
Commission Number:
My commission expires:
(Notarial Seal)

State of Virginia
249663

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Certificate of Service

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S. Mail and facsimile to the following addressees this 20 day of January, 2009.

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