

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

JANE DOE,

**CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON**

Plaintiff,

Vs.

JEFFREY EPSTEIN, et al.

Defendant.

/

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,  
08-80994, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092

/

**PLAINTIFF JANE DOE'S PROTECTIVE RESPONSE TO DEFENDANT'S MOTION  
FOR RECONSIDERATION AND/OR REQUEST FOR RULE 4 REVIEW AND APPEAL**

Plaintiff, Jane Doe, hereby files this protective response to Defendant's Consolidated Rule 4 Review and Appeal of Portions of the Magistrate's Orders Dated February 4, 2010 (DE 462), (DE 480) and April 1, 2010 (DE 513), with Incorporated Objections and Memorandum of Law (doc. #454).

Jane Doe had understood that she had fully briefed the issues raised by the defendant's pleading when on March 10, 2010, she filed her response in Opposition to Defendant's Motion for Reconsideration (doc. #485). It appears, however, the defendant Epstein may view his "consolidated" appeal as requiring some sort of new response from Jane Doe. If so, Jane Doe wishes to make clear that she continues to

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assert the responses she raised in her earlier response and hereby files this protective response incorporating by reference all of her earlier arguments.

Jane Doe would also note she filed her request for these documents on July 20, 2009. Through a seemingly endless series of motions, all of which have been rejected on the merits, Epstein has blocked turning over tax returns and other documents that the Government has already seen on Fifth Amendment grounds for more than ten months. Jane Doe's trial date is less than two months away on July 19, 2010, and she needs the requested items soon to prepare for trial.

Jane Doe attempted to negotiate a resolution to these issues with counsel for Epstein, but the negotiations failed.

Jane Doe therefore respectfully requests that the Court promptly order production of these documents to her.

DATED: May 27, 2010

Respectfully Submitted,

s/ Bradley J. Edwards  
Bradley J. Edwards  
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*and*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 27, 2010 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically filed Notices of Electronic Filing.

s/ Bradley J. Edwards  
Bradley J. Edwards

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United States District Court, Southern District of Florida**

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