

PLAINTIFF JANE DOE'S RESPONSE TO DEFENDANT'S MOTION FOR PROTECTIVE ORDER [DE 536]

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

EXHIBIT A

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

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AFFIDAVIT OF BRADLEY J. EDWARDS, ESQ.

STATE OF FLORIDA)
)SS
COUNTY OF BROWARD)

BEFORE ME, the undersigned authority, personally appeared Bradley J. Edwards, Esq., having personal knowledge and being duly sworn, deposes and says:

1. I have reviewed the Motion for Protective Order related to the deposition of Story Cowles, and contrary to the assertions in that Motion there are many reasons I wish to depose Story Cowles to ask him questions that could not possibly be protected by privilege.
2. Story Cowles visited Epstein 159 times between 7/14/08 and 2/8/09, while Epstein was incarcerated in the Palm Beach County Detention facility. (See PBD Department of Corrections Official Visitor Logs attached here to as Exhibit I)

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3. Many times, Story Cowles was visiting Epstein while another third party visitor was present, such as Epstein co-conspirators Sarah Kellen and Nadia Marcinkova.

4. According to jail logs, Story Cowles visited Epstein in jail by stating that he was either a "Paralegal" an "Attorney" or "Public Defender."

5. Through information and belief, Story Cowles is not an attorney, does not have any paralegal training and is not a Florida Licensed Paralegal.

6. Numerous witnesses have testified that Story Cowles is Sarah Kellen's boyfriend and has been such for well over one year.

7. At one point, several attorneys who represent Plaintiffs in related actions, including myself, were trying to serve Sarah Kellen (known as Epstein's main co-conspirator) for deposition, and it seemed that she was intentionally avoiding service.

8. Another attorney discussed with Mr. Goldberger that he would like to depose Story Cowles to learn of Sarah Kellen's whereabouts, at which time Mr. Goldberger indicated that he could have Ms. Kellen produced which would eliminate the need for Story Cowles's deposition.

9. At that point in time, I did not know Mr. Cowles full role or involvement with Jeffrey Epstein, and as long as Sarah Kellen testified truthfully and completely then there would be no need for Mr. Cowles testimony.

10. Rather than testifying, Sarah Kellen, like Mr. Epstein and Nadia Marcinkova, took the 5th on every substantive question just as she was instructed to do

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by her attorney, Bruce Reinhart, and she provided no substantive information to Plaintiffs.

11. Epstein's pilot, Larry Visoski, testified that Story Cowles actually worked with/for Mr. Epstein at the Florida Science Foundation where Mr. Cowles kept an office.

12. Epstein's house manager, Janusz Banaziak, testified that Story Cowles worked for Epstein at Epstein's home.

13. Story Cowles has represented to Jeffrey Epstein's probation officer that he is Epstein's assistant, not a paralegal at a law firm. (See Excerpts from the voluminous Probation File of Jeffrey Epstein attached hereto as Exhibit II)

14. Story Cowles communicates to Epstein's probation officer, on Epstein's behalf, from his private email and the cell phone number Jeffrey Epstein provided to Probation comes back registered to Story Cowles. (See Exhibit II)

15. Story Cowles through information and belief was made to sign a confidentiality agreement with his boss, Jeffrey Epstein, and that is consistent with Epstein's way of making all of his employees sign a confidentiality agreement.

16. Story Cowles is at Epstein's house almost every day of the week with Sarah Kellen or Epstein or both.

17. Sarah Kellen's sole employment is working for Epstein, and Story Cowles is her boyfriend that has spent nights with her, gone to parties with her, talked privately with her and with Nadia Marcinkova, and he has even taken a trip around the world with Sarah Kellen.

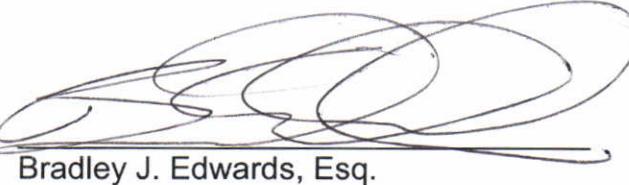
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18. Story Cowles has communicated regularly with other people close to Epstein, such as Nadia Marcinkova; he undoubtedly has relevant and non-privileged information related to Epstein.

19. Story Cowles frequently visits Epstein's house and knows of the visitors and other potential witnesses that have stayed with or visited Epstein in the past two years because he has personally observed and interacted with the visitors.

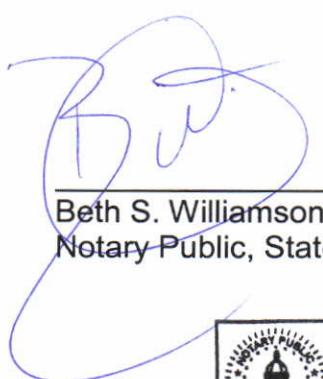
20. His deposition is not being taken to harass nor intimidate nor to attempt to circumvent a privilege, and it is only being set in good faith and for the purpose of obtaining meaningful and relevant testimony, which may be the only non-5th amendment testimony available to Plaintiffs.

FURTHER AFFIANT SAYETH NAUGHT.



Bradley J. Edwards, Esq.

SWORN TO and SUBSCRIBED before me this the 7th day of May 2010, by Bradley J. Edwards, Esq., who is personally known to me, at Fort Lauderdale, Broward County, Florida.



Beth S. Williamson
Notary Public, State of Florida

My commission expires:

