

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

CASE NO: 2019CA014681XXXXMB AG

CA FLORIDA HOLDINGS, LLC,
Publisher of THE PALM BEACH POST,
Plaintiff,

vs.

DAVE ARONBERG, as State Attorney of
Palm Beach County, Florida, SHARON R. BOCK,
as Clerk & Comptroller, Palm Beach County,
Florida,
Defendants.

**DEFENDANT, SHARON R. BOCK, AS CLERK & COMPTROLLER,
PALM BEACH COUNTY'S RESPONSE TO PLAINTIFF'S AMENDED REQUEST FOR
PRODUCTION**

Defendant, Sharon R. Bock, as Clerk & Comptroller, Palm Beach County, by and through undersigned counsel, hereby files this Response to Plaintiff's Amended Request for Production dated July 10, 2020, and states as follows:

GENERAL OBJECTIONS

1. The Clerk will produce documents in its possession or control, if any, subject to the limitations set forth below.
2. The Clerk reserves the right to supplement, amend or correct all or any part of the responses provided herein.
3. By producing documents pursuant to the Amended Request, the Clerk does not (a) admit that such documents (or related documents) are properly discoverable; (b) waive any objection which might otherwise be made to such documents; or (c) admit that any such documents are admissible at trial.

4. The Clerk will make reasonable efforts to respond to each item of the Request, as the Clerk understands and interprets the Request. If the Plaintiff subsequently asserts an interpretation of any item in the Request that differs from the Clerk's interpretation, the Clerk reserves the right to supplement the objections and responses.

5. The Clerk objects to the Request to the extent that it seeks "all" documents, and is thus so broad, vague and indefinite as to make it impossible for the Clerk to ascertain the specific information requested. As previously stated, (i) such broad, vague, and indefinite requests are unduly burdensome and oppressive, and it would be practically impossible for the Clerk to produce the documents; and (ii) such broad, vague, and indefinite requests may call for documents which are neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

6. The Clerk objects to the extent any item of the Request seeks documents that are privileged under federal and/or state privacy rights.

DOCUMENTS TO BE PRODUCED

1. Copies of all logs, notations, registers, lists and entries that show the delivery of Epstein Grand Jury Materials from the Clerk to the State Attorney. The specific materials delivered need not be disclosed or produced.

RESPONSE: The Clerk is not in possession of any logs, notations, registers, lists and entries that show the delivery of Epstein Grand Jury Materials from the Clerk to the State Attorney.

2. Copies of all logs, notations, registers, lists and entries that show the return of Epstein Grand Jury Materials by the State Attorney to the Clerk. The specific materials returned need not be disclosed or produced.

RESPONSE: The Clerk is not in possession of any logs, notations, registers, lists and entries that show the return of Epstein Grand Jury Materials by the State Attorney to the Clerk.

3. Copies of all communications between the Clerk and the State Attorney concerning the storage, possession, delivery, receipt and control of Epstein Grand Jury Materials. The specific materials referenced need not be disclosed or produced.

RESPONSE: A search of the Clerk's records from June 2009 to present revealed that there were no responsive records between the Clerk and the State Attorney concerning the storage, possession, delivery, receipt and control of Epstein Grand Jury Materials. Electronic communication prior to June 2009 is not reasonably accessible and is duly burdensome to research.

4. Copies of all logs, notations, registers, lists and entries that show the general types of Epstein Grand Jury Materials in the possession of the Clerk, without revealing their contents.

RESPONSE: Our research found no logs, notations, registers, lists and entries that show the general types of "Epstein Grand Jury Materials."

5. Copies of all logs, notations, registers, lists and entries that show the delivery of Epstein Grand Jury Materials to the Federal Bureau of Investigation. The specific materials referenced need not be disclosed or produced.

RESPONSE: The Clerk is not in possession of any logs, notations, registers, lists and entries that show the delivery of Epstein Grand Jury Materials to the Federal Bureau of Investigation.

6. Copies of all logs, notations, registers, lists and entries that show the delivery of Epstein Grand Jury Materials to the United States Department of Justice and/or any Office of the United States Attorney. The specific materials referenced need not be disclosed or produced

RESPONSE: The Clerk is not in possession of any logs, notations, registers, lists and entries that show the delivery of Epstein Grand Jury Materials to the United States Department of Justice and/or any Office of the United States Attorney.

7. Copies of all subpoenas and any judicial process served upon the Clerk for production of Epstein Grand Jury Materials.

RESPONSE: No responsive records have been located at this time. Any subpoena or judicial process served upon the Clerk for production of Epstein Grand Jury Materials would likely be included in the Epstein Grand Jury Material, which cannot be released without a Court order.

8. Copies of all communications between the Clerk and the United States Department of Justice, or the Federal Bureau of Investigation or any Offices of the United States Attorney concerning Epstein Grand Jury Materials. The specific materials referenced need not be disclosed or produced.

RESPONSE: A search of the Clerk's records from June 2009 to present revealed that there were no responsive records between the Clerk and the United States Department of Justice, or the Federal Bureau of Investigation or any Offices of the United States Attorney concerning the Epstein Grand Jury Materials. Electronic communication prior to June 2009 is not reasonably accessible and is duly burdensome to research.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been emailed in compliance with the Florida Rules of Judicial Administration 2.516, on this 2nd day of September, 2020, to: Stephen A. Mendelsohn, Esq., Greenberg Traurig, P.A., 5100 Town Center Circle, Suite 400, Boca Raton, FL 33486, email: mendelsohns@gtlaw.com and Douglas A. Wyler, Esq., 961687 Gateway Blvd., Suite 201-I, Fernandina Beach, FL 32034, email: jacobsscholzlaw@comcast.net.

Cynthia M. Guerra, Esq.
For Sharon R. Bock, Clerk & Comptroller
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BY: s/Cynthia M. Guerra
Florida Bar No. 886610