

Plg 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.

Comp Ex "A"

cc: JE-16
alv

Doe No. 2 v. Epstein
Page 8

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)

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

Adg

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80232-MARRA-JOHNSON

JANE DOE NO. 3,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

_____ /

**PLAINTIFF JANE DOE 3'S ANSWERS TO DEFENDANT'S FIRST
INTERROGATORIES**

Plaintiff, JANE DOE 3, by and through their 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.

*cc-JA, LE
dive*

Doe No. 3 v. Epstein
Page 8

No.

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, emotional and psychical injuries, including without limitation, anxiety, depression, suicidal ideation, guilt, self-blame, feelings of being degraded, feeling unattractive, diminished sense of femininity, fluctuations in weight/appetite, sexual/intimacy problems, flashbacks, disturbing memories, stress, irritability, feelings of being isolated and trapped, diminished trust, social problems, problems in personal relationships, indecisiveness, lower energy, lower ambition and initiative, headaches, back pain, feels stress (particularly around men), obsessive thoughts, problems concentrating, alcohol abuse, corruption of morals and values, loss of innocence. and cries alot.

Plaintiff's psychological and emotional injuries will be analyzed and explained 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.



Discovery is ongoing and will be supplemented in accordance with the Federal Rules of Civil Procedure.

VERIFICATION

 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.



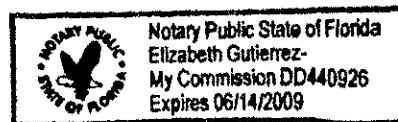
STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

 SWORN TO AND SUBSCRIBED before me this 19 day of January, 2009 by , who is personally known to me or has produced the following identification 1 Rivers license which is current or has been issued within the past five years and bears a serial or other identifying number.

Elizabeth Gutierrez
Print Name

Elizabeth Gutierrez
Signature

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



Page 7

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80994-MARRA-JOHNSON

JANE DOE NO. 6,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

_____ /

PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES

Plaintiff, JANE DOE 6, 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.

*cc: JG, NE, DT
disc.*

Doe No. 6 v. Epstein
Page 5

Discovery is ongoing and will be supplemented in accordance with the Federal Rules of Civil Procedure.

6. Please state the specific nature and substance of the knowledge that you believe the person(s) identified in your response to interrogatory no. 5 may have.

Answer:

See Plaintiff's Answer to Interrogatory No. 5.

7. Were you suffering from physical infirmity, disability, disease, sickness, or psychiatric/psychological condition at the time of the incident(s) described in the complaint? If so, what was the nature of the infirmity, disability, or sickness?

Answer:

Plaintiff was diagnosed with PTSD following a car accident in 2003.

8. Did you consume any alcoholic beverages or take any drugs or medications within 12 hours before the time of each incident(s) described in the complaint? If so, state the type and amount of alcoholic beverages, drugs, or medication which were consumed, and when and where you consumed them.

Answer:

No.

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, anger, distorted and disrupted development, restlessness, distrust, self destructive behaviors, suicidal behavior, substance abuse, severe Xanax addiction beginning after her encounter with Epstein, corruption of morals, antisocial behaviors, premature teenage pregnancy, loss of normal adolescent ideals, loss of innocence.

Doe No. 6 v. Epstein
Page 6

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 vague, overly broad, unduly burdensome, calling for speculation, and calling for an expert opinion. Subject to said objections, Plaintiff states:

Discovery is ongoing and will be supplemented in accordance with Federal Rules of Civil Procedure.

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 case; and state as to each the date of treatment or examination and the injury or condition for which you were examined or treated.

Answer:

[REDACTED]

12. List the names and business addresses of all other physicians, medical facilities, rehab facilities (drug, alcohol or psychiatric) or other health care providers including psychiatrist, psychologist, mental health counselor and chiropractors by whom or at which you have been examined or treated in the past 10 years; and state as to each the dates of examination or treatment and the condition or injury for which you were examined or treated.

Answer:

Doe No. 6 v. Epstein
Page 11

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.

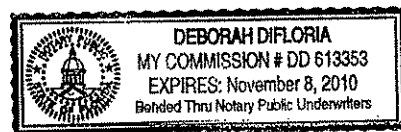
STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

SWORN TO AND SUBSCRIBED before me this 14th day of January, 2009 by [REDACTED], who is personally known to me or has produced the following identification [REDACTED] which is current or has been issued within the past five years and bears a serial or other identifying number.

Deborah DiFloria
Print Name

Signature _____

NOTARY PUBLIC - STATE OF FLORIDA
Commission Number:
My commission expires: *November 8, 2016*
(Notarial Seal)



By: _____
Adam Horowitz
Jeffrey M. Herman
Stuart Mermelstein
Herman & Mermelstein, P.A.
18205 Biscayne Blvd.
Suite 2218
Miami, FL 33160
(305) 931-2200
Fax: (305) 931-0877

Doe No. 6 v. Epstein
Page 13

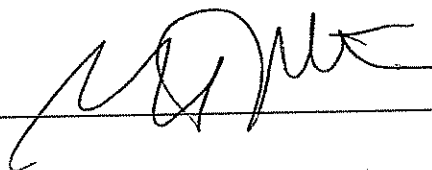
Certificate of Service

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S. Mail and facsimile to the following addressees this 26 day of January, 2009.

Robert D. Critton, Jr, Esq.
Burman, Critton, Luttier & Coleman
515 N. Flagler Drive, Suite 400
West Palm Beach, FL 33401
561/842-2820 Phone
561/515-3148 Fax
rcrit@bclclaw.com
Co-Counsel for Defendant Jeffrey Epstein

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
561-659-8300
Fax: 561-835-8691
jagesq@bellsouth.net
Co-Counsel for Defendant Jeffrey Epstein

Michael R. Tein, Esq.
Lewis Tein, P.L.
3059 Grand Avenue, Suite 340
Coconut Grove, FL 33133
305-442-1101
Fax: 305 442 6744
Co-Counsel for Defendant Jeffrey Epstein
tein@lewistein.com



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80993-MARRA-JOHNSON

JANE DOE NO. 7,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**PLAINTIFF JANE DOE 7'S ANSWERS TO
DEFENDANT'S FIRST INTERROGATORIES**

Plaintiff, JANE DOE 7, by and through their 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.

cc: K. J. E.
du

Doe No. 7 v. Epstein
Page 6

Jane Doe 1 (who is not represented by the undersigned attorneys)

Hayley Robson

Plaintiff's classmate who brought Plaintiff to Defendant's estate on 2 occasions

[REDACTED]
Plaintiff's classmate who accompanied Plaintiff to Defendant's estate on at least one occasion

[REDACTED] or [REDACTED] accompanied Plaintiff to Defendant's estate on at least one occasion, but Plaintiff is unable to recall which sister it was.

Discovery is ongoing and may be supplemented in accordance with the Federal Rules of Civil Procedure.

6. Please state the specific nature and substance of the knowledge that you believe the person(s) identified in your response to interrogatory no. 5 may have.

Answer:

See Plaintiff's Answer to Interrogatory No. 5.

7. Were you suffering from physical infirmity, disability, disease, sickness, or psychiatric/psychological condition at the time of the incident(s) described in the complaint? If so, what was the nature of the infirmity, disability, or sickness?

Answer:

No.

8. Did you consume any alcoholic beverages or take any drugs or medications within 12 hours before the time of each incident(s) described in the complaint? If so, state the type and amount of alcoholic beverages, drugs, or medication which were consumed, and when and where you consumed them.

Answer:

No.

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

Doe No. 7 v. Epstein
Page 7

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, disturbed sleep, depression, alcohol abuse, panicky, hypersexuality/promiscuity, inability to trust, diminished judgment regarding others, diminished sense of future prospects, corruption of morals, distorted and disrupted development, loss of normal adolescent ideals.

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.

Discovery is ongoing and will be supplemented in accordance with the Federal Rules of Civil Procedure.

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 case; and state as to each the date of treatment or examination and the injury or condition for which you were examined or treated.

Answer:

[REDACTED]

Jane Doe No. 7 v. Epstein
Page 15

against Mr. Epstein and regarding whether there would be any benefit from your voluntary cooperation with law enforcement.

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]

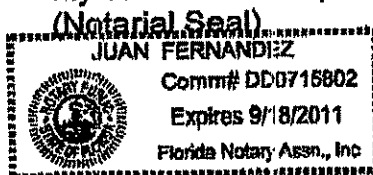
STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

[REDACTED] SWORN TO AND SUBSCRIBED before me this 23rd day of January 2008 by [REDACTED] who is personally known to me or has produced the following identification [REDACTED] which is current or has been issued within the past five years and bears a serial or other identifying number.

Juan Fernandez
Print Name

[Signature]
Signature

NOTARY PUBLIC - STATE OF FLORIDA
Commission Number: D120715802
My commission expires: 9/18/2011



Doe No. 7 v. Epstein
Page 15

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 26 day of January, 2009.

Robert D. Critton, Jr, Esq.
Burman, Critton, Luttier & Coleman
515 N. Flagler Drive, Suite 400
West Palm Beach, FL 33401
561/842-2820 Phone
561/515-3148 Fax
rcrit@bclclaw.com
Co-Counsel for Defendant Jeffrey Epstein

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
561-659-8300
Fax: 561-835-8691
jagesq@bellsouth.net
Co-Counsel for Defendant Jeffrey Epstein

Michael R. Tein, Esq.
Lewis Tein, P.L.
3059 Grand Avenue, Suite 340
Coconut Grove, FL 33133
305-442-1101
Fax: 305 442 6744
Co-Counsel for Defendant Jeffrey Epstein
tein@lewistein.com

