

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

\_\_\_\_\_  
Related cases:

08-80232, 08-08380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092  
\_\_\_\_\_

**DEFENDANT, JEFFREY EPSTEIN'S RESPONSE TO PLAINTIFF, CAROLYN  
MARGARET ANDRIANO'S, MOTION FOR PROTECTIVE ORDER AS TO  
DEFENDANT, JEFFREY EPSTEIN'S, ATTENDANCE AT PLAINTIFF'S  
DEPOSITION (DE 331)**

Defendant, JEFFREY EPSTEIN (hereinafter "Epstein"), by and through his undersigned attorneys, hereby files his Response to Plaintiff, Carolyn Margaret Andriano's, Motion for Protective Order as to Defendant, Jeffrey Epstein's, Attendance at Plaintiff's Deposition and Notice of Incorporation of Notice of Reliance of Supplemental Authority (DE 324).

1. On September 29, 2009, Plaintiff filed her Motion for Protective Order as to Defendant, Jeffrey Epstein's, Attendance at Deposition (DE 331).

2. At Paragraph 4 of Plaintiff's Motion for Protective Order, Plaintiff incorporated DE 292 and DE 297 as her arguments supporting the relief sought (i.e. to

prevent Epstein from attending Carolyn Margaret Andriano's Disposition). DE 292 and 297 were filed by Plaintiffs, Jane Does 2-8.

3. On September 11, 2009, Epstein filed his Emergency Motion to Strike Plaintiff's Motion for Protective Order (DE 292) and Emergency Motion to Allow the Attendance of Jeffrey Epstein at the Deposition of Plaintiffs and Response in Opposition to Plaintiff's, Jane Does Nos. 2-8, Motion for Protective Order as to Jeffrey Epstein's Attendance at the Deposition of Plaintiffs with Incorporated Memorandum of Law.

4. The arguments set forth in DE 296 are incorporated herein by reference in response to Carolyn Margaret Andriano's Motion for Protective Order filed at DE 331.

5. The arguments set forth in Epstein's Motion at DE 296 apply equally in response to the arguments set forth by Plaintiff, Carolyn Margaret Andriano, at DE 331.

WHEREFORE, Epstein respectfully requests that this Court enter an order denying Plaintiff's Motion for Protective Order, provide that Epstein is permitted to attend the depositions of the Plaintiffs that have asserted claims against him in the related matters, and for such other and further relief as this Court deems just and proper.

By:   
MICHAEL J. PIKE, ESQ.  
Florida Bar #617296

**Certificate of Service**

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following Service List in the manner specified by CM/ECF on this 16<sup>th</sup> day of October 2009

Respectfully submitted,

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**Certificate of Service**

**Jane Doe No. 2 v. Jeffrey Epstein**

**Case No. 08-CV-80119-MARRA/JOHNSON**

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