

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

DARREN K. INDYKE AND RICHARD D. KAHN,
in their capacities as the executors of the ESTATE OF
JEFFREY E. EPSTEIN,

Defendants.

Index No. 1:19-cv-08673-KPF-DCF

**DEFENDANTS' FIRST SET OF INTERROGATORIES
TO PLAINTIFF**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and subject to the following instructions and definitions, Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (the "Co-Executors" or the "Defendants"), by and through their undersigned counsel, submit this First Set of Interrogatories (the "Interrogatories") to Plaintiff. Plaintiff shall provide answers to each individual interrogatory within thirty (30) days after the date of service hereof, to the offices of Troutman Sanders LLP, Attn: Bennet Moskowitz, 875 Third Avenue, New York, NY 10022.

DEFINITIONS

The following terms herein have the following meanings:

1. The definitions and rules of construction set forth in Rule 26.3(c) and (d) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York are incorporated herein by reference. Without limitation to the foregoing, the term “document” specifically includes electronic documents and data -- whether such data has been “deleted” or not -- residing on any server, computer, terminal, hard drive, diskette, CD, DVD, tape, or other storage media.
2. The term “Decedent” means Jeffrey Edward Epstein.
3. The term “this litigation” means the above captioned action.
4. The terms “you” or “your” means the Plaintiff in this litigation and all other persons acting for Plaintiff or on her behalf, including, without limitation, representatives, agents, employees, attorneys, accountants and investigators.
5. The term “medical providers” means all persons who provide advice or treatment, or participate in evaluations or assessments, concerning an individual’s health or well-being, whether mental or physical. This includes, but is not limited to, all doctors, psychiatrists, psychologists, counselors, nurses, physical therapists, physicians’ assistants, nurse practitioners, medical technicians, behavioral specialists, massage therapists, chiropractors, behavioral therapists, nutritionists, technicians and mental therapists, whether licensed or otherwise.
6. The term “medical procedures and consultations” means all evaluations, consultations, procedures, examinations, and appointments conducted by, with or on behalf of one or more medical providers. This includes, but is not limited to, all doctors’ appointments, solo or

group therapy sessions, medical and psychiatric evaluations, lab work, surgeries, observations, prescriptions, tests, nutrition plans and diagnoses.

7. The term “Complaint” means the complaint filed by Plaintiff in this litigation and all amendments thereto.

INSTRUCTIONS

The following instructions apply to each individual interrogatory contained herein:

1. The provisions of Rules 26 and 34 of the Federal Rules of Civil Procedure and Rules 26.2 and 26.3 of the Local Civil Rules for the United States District Court for the Southern and Eastern Districts of New York are incorporated by reference as if fully set forth herein.

2. If you object to any part of the following interrogatories and refuse to answer that part, state your objection and answer the remaining portions.

3. If any of the following interrogatories cannot be answered in full after exercising due diligence to secure the information, please so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information you have concerning the unanswered portions.

4. If any of your answers to the following interrogatories are qualified in any manner, set forth the details of such qualification.

5. You must furnish all information responsive to these interrogatories that is in your actual or constructive possession, custody or control, including all responsive information within the actual or constructive possession, custody or control of all of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf.

6. In the event you claim that any information called for in any interrogatory is immune from discovery on the grounds of attorney-client privilege, the work product doctrine, or any other privilege or immunity from disclosure, you must provide in writing all information required by Local Civil Rule 26.2.

7. Where an interrogatory asks that a date, an amount, or any other specific information be provided, your best approximation of the information requested and the basis upon which your approximation is grounded is to be given if the precise information requested is unknown.

8. If, in responding to the interrogatories, you claim that there is any ambiguity in either a particular interrogatory or in a definition or an instruction applicable thereto, such claim shall not be used by you as a basis for refusing to answer, but you shall set forth as part of the response the language deemed to be ambiguous and the interpretation chosen or used in responding to the particular interrogatory.

9. For purposes of interpreting or construing the following interrogatories, the terms used are to be given their most expansive and inclusive interpretation, unless otherwise specifically limited in the interrogatory itself.

10. In the event it is claimed that any interrogatory is premature because your investigation of the subject matter of the interrogatory or your discovery is not completed, provide all the information now available to you and promptly supplement the response as soon as further information is found.

11. The following interrogatories are continuing in nature, and you are must provide all additional responsive information by way of supplemental responses.

INTERROGATORIES

1. Identify all persons with knowledge of information concerning the subject matter of this litigation, and the subject matter of their knowledge.

2. Identify and describe the computation of each category of damages for which you seek recovery in this litigation.

3. Identify the existence, custodian and location of, and generally describe, all documents and communications concerning the subject matter of this litigation.

4. Identify each employee of, agent of, or other individual associated with Decedent with whom you communicated or interacted; and identify the date of, and describe the nature of, each such communication or interaction.

5. Describe with particularity all duties owed to you by Decedent.

6. Identify and describe with particularity each act or omission on the part of Decedent that you allege constitutes a breach of a duty owed to you. For each act or omission identified, identify the date of the alleged act or omission, all persons with knowledge of the facts set forth in your response to this interrogatory, and all documents evidencing or otherwise concerning the information set forth in your response to this interrogatory.

7. Identify and describe with particularity each act or omission on the part of Decedent that you allege constitutes a violation of New York Penal Law § 130. For each act or omission identified, identify the date of the alleged act or omission, all persons with knowledge of the facts set forth in your response to this interrogatory, and all documents evidencing or otherwise concerning the information set forth in your response to this interrogatory.

8. Identify with particularity each act or omission on the part of Decedent that you allege constitutes a tort. For each act or omission identified, identify the date of the alleged act or

omission, the tort you allege the act or omission constitutes, all persons with knowledge of the information set forth in your response to this interrogatory, and all documents evidencing or otherwise concerning such information.

9. Identify all persons other than Decedent who have ever committed or attempted to commit sexual misconduct or offenses against or otherwise concerning you, including, without limitation, any unwelcome behavior of a sexual nature, sexual abuse, sexual assault, threats or intimidation of a sexual nature, or sexual exploitation, regardless of whether the misconduct or offenses involved physical touching. For each person identified, identify the misconduct or offense committed, and the date and location of the misconduct or offense.

10. Identify all medical procedures and consultations you received, including the dates of each procedure and consultation, the locations of each procedure and consultation, and the identities of all medical providers who conducted or otherwise participated in each procedure and consultation. The relevant time period for this interrogatory is the date on which you first learned of Decedent through the date of your responses to these interrogatories.

11. Regardless of date and the relation (or lack thereof) to Decedent's acts and omissions alleged in the Complaint or otherwise, identify all medical procedures and consultations you received evidencing or otherwise concerning the following conditions:

- a. an eating disorder,
- b. emotional distress,
- c. psychological or psychiatric trauma,
- d. mental anguish,
- e. humiliation,
- f. confusion,
- g. embarrassment,
- h. loss of self-esteem,
- i. loss of dignity,
- j. loss of enjoyment of life,
- k. pain,
- l. suffering, or

m. any condition that would require surgery to correct.

12. State whether you have ever experienced the same or similar conditions and damages, for which you seek recovery from Defendants in this litigation, as a result of acts or omissions by persons other than Decedent. If you answer this interrogatory in the affirmative: identify each such person; describe the acts or omissions that resulted in the damages; identify the dates and locations of such acts and omissions; and describe the damages that resulted.

13. Identify all things of value you received from Decedent, including a description of the thing, the date on which you received the thing, and the person who tendered the thing to you.

14. Identify all documents and communications upon which you intend to rely in this litigation, including but not limited to in the course of depositions, in support of any motion, and at any hearing or trial.

15. Identify all documents and communications evidencing or otherwise concerning damages and everything else for which you seek recovery in this litigation, including but not limited to damages you allege in your Complaint, medical fees, attorneys' fees and lost wages.

Dated: New York, New York
March 10, 2020

TROUTMAN SANDERS LLP

By: s/Bennet Moskowitz
Bennet Moskowitz
875 Third Avenue
New York, New York 10022
Tel: (212) 704- 6087
bennet.moskowitz@troutman.com

Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that on March 10, 2020, I served a copy of the foregoing *Defendants' First Set of Interrogatories to Plaintiff*, by sending them via email and Federal Express to:

Roberta A. Kaplan
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118

TROUTMAN SANDERS LLP

By: s/Mary Grace W. Metcalfe
Mary Grace W. Metcalfe
875 Third Avenue
New York, New York 10022
Tel: (212) 704-6029
marygrace.metcalfe@troutman.com

Attorney for Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

DARREN K. INDYKE AND RICHARD D. KAHN,
in their capacities as the executors of the ESTATE OF
JEFFREY E. EPSTEIN,

Defendants.

Index No. 1:19-cv-08673-KPF-DCF

**DEFENDANTS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO PLAINTIFF**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and subject to the following instructions and definitions, Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (the "Co-Executors" or the "Defendants"), by and through their undersigned counsel, make this First Request for Production of Documents to Plaintiff. The documents shall be produced within thirty (30) days after the date of service hereof, at the offices of Troutman Sanders LLP, Attn: Bennet Moskowitz, 875 Third Avenue, New York, NY 10022.

DEFINITIONS

The following terms have the following meanings and shall apply to each individual request for documents herein:

1. The definitions and rules of construction set forth in Rules 26.3(c) and (d) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York are incorporated herein by reference. Without limitation to the foregoing, the term “document” specifically includes electronic documents and data -- whether such data has been “deleted” or not -- residing on any server, computer, terminal, hard drive, diskette, CD, DVD, tape, or other storage media.

2. The term “Decedent” means Jeffrey Edward Epstein.

3. The term “this litigation” means the above-captioned action.

4. The terms “you” or “your” means the Plaintiff in this litigation and all other persons acting for Plaintiff or on her behalf, including, without limitation, representatives, agents, employees, attorneys, accountants and investigators.

5. The term “other legal proceeding” means, excluding this litigation, all currently pending, prior, threatened and proposed criminal and civil actions and alternative dispute resolution proceedings, whether arbitration, mediation or otherwise.

6. The term “investigation” means any inquiry or investigation by any local, state, federal, or regulatory agency or authority.

7. The term “medical providers” means all persons who provide advice or treatment, or participate in evaluations or assessments, concerning an individual’s health or well-being, whether mental or physical. This includes, but is not limited to, all doctors, psychiatrists, psychologists, counselors, nurses, physical therapists, physicians’ assistants, nurse practitioners,

medical technicians, behavioral specialists, massage therapists, chiropractors, behavioral therapists, nutritionists, technicians and mental therapists, whether licensed or otherwise.

8. The term “medical procedures and consultations” means all evaluations, consultations, procedures, examinations, and appointments conducted by, with or on behalf of one or more medical providers. This includes, but is not limited to, all doctors’ appointments, solo or group therapy sessions, medical and psychiatric evaluations, lab work, surgeries, observations, prescriptions, tests, nutrition plans and diagnoses.

9. The term “Complaint” means the complaint filed by Plaintiff in this litigation, and all amendments thereto.

10. The term “non-party” means any person other than the parties to this litigation.

INSTRUCTIONS

The following instructions apply to each individual request for documents contained herein:

1. The provisions of Rules 26 and 34 of the Federal Rules of Civil Procedure and Rules 26.2 and 26.3 of the Local Civil Rules for the United States District Court for the Southern and Eastern Districts of New York are incorporated by reference as if fully set forth herein.

2. You must produce all documents responsive to these requests which are in your actual or constructive possession, custody or control, including all documents within the actual or constructive possession, custody or control of all of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf.

3. All documents are to be produced as they are kept in the usual course of business, in the files in which such documents have been maintained, and in the order within each file in

which such documents have been maintained. All documents are to be produced along with copies of folders in which they are kept.

4. If you know of the existence, past or present, of any document requested herein, but are unable to produce such document because it is not presently in your possession, custody or control, or in the possession, custody or control of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf, you shall so state in your response and shall identify (by title, if any, nature of document and subject matter) such document and shall identify (by name, address and telephone number) the person in whose possession, custody or control the document was last known to reside.

5. For purposes of interpreting or construing the following requests, the terms used are to be given their most expansive and inclusive interpretation, unless otherwise specifically limited in the document request itself.

6. You must respond fully to each document request. If you object to a document request, you must state with specificity all grounds for your objection. If an objection pertains only to a portion of a document request, or a word, phrase or clause contained therein, you must state your objection to that portion only and respond as completely as possible to the remainder of the document request. No part of any document request may be left unanswered merely because an objection is interposed to another part of the request.

7. If your answer to any document request is qualified in any manner, you must set forth the reason for and details of such qualification.

8. In the event you claim that any information called for in any document request is immune from discovery on the grounds of attorney-client privilege, the work product doctrine, or

any other privilege or immunity from disclosure, you must provide in writing all information required by Local Civil Rule 26.2.

9. A complete original or copy of each document or thing must be produced, even if only a portion of such document or thing is responsive to a document request. Documents should not be edited, cut, redacted (except where you assert a claim of attorney-client privilege, work product doctrine, or other privilege or immunity from disclosure with respect to a portion of a document), or expunged, and should include all attachments, appendices, tables and exhibits, in addition to all covering memoranda, letters, folders or documents.

10. Electronically stored information should be produced in accordance with the Parties' agreed upon ESI protocols.

11. The relevant time period for these requests, unless otherwise indicated by an individual request, is the date on which you first learned of Decedent through the date of your responses to these requests.

12. These requests are continuing in nature. You must produce all additional responsive information and documents by way of supplemental responses.

DOCUMENT REQUESTS

1. All documents and communications with or otherwise concerning Decedent. This includes, without limitation, all communications concerning Decedent which are to, from, or which copy: (i) members of the press, media or publishing industry; (ii) law enforcement personnel; (iii) government agents, including, without limitation, prosecutors and government attorneys; and communications which are to, from, or which copy you or your attorneys, on the one hand, and other persons who have filed lawsuits or made claims against Decedent or his estate, or such other persons' attorneys, on the other hand.

2. To the extent not otherwise produced in response to the foregoing, all documents and communications concerning any other legal proceeding or investigation that concerns Decedent.

3. To the extent not otherwise produced in response to the foregoing, all non-privileged documents and communications concerning this litigation.

4. A copy of your birth certificate.

5. Copies of all of your passports.

6. Documents sufficient to establish your place of residency at all times during the relevant time period.

7. Documents sufficient to establish your domicile at all times during the relevant time period.

8. Documents sufficient to identify the location, nature, and scope of your employment during the relevant time period.

9. Documents sufficient to identify the source, nature, and scope of all financial support or income you received during the relevant time period.

10. Documents sufficient to establish your complete academic history.

11. Documents sufficient to identify all telephone numbers you used during the relevant time period.

12. Documents sufficient to identify all email addresses you used during the relevant time period.

13. All documents and communications concerning all medical procedures and consultations you received during the relevant time period.

14. Regardless of date and the relation (or lack thereof) to Decedent's acts and omissions alleged in the Complaint or otherwise, all documents and communications concerning all medical procedures and consultations you received evidencing or otherwise concerning the following conditions:

- a. an eating disorder,
- b. emotional distress,
- c. psychological or psychiatric trauma,
- d. mental anguish,
- e. humiliation,
- f. confusion,
- g. embarrassment,
- h. loss of self-esteem,
- i. loss of dignity,
- j. loss of enjoyment of life,
- k. pain,
- l. suffering, or
- m. any condition that would require surgery to correct.

15. To the extent not otherwise produced in response to the foregoing request and regardless of date and the relation (or lack thereof) to Decedent's acts and omissions alleged in the Complaint or otherwise, all documents and communications evidencing or otherwise concerning your experience of the same or similar conditions and damages for which you seek recovery from Defendants in this litigation.

16. To the extent not otherwise responsive to these requests, all documents and communications concerning anything of value you received from Decedent.

17. To the extent not otherwise responsive to these requests, all documents and communications concerning your allegations in the Complaint.

18. To the extent not otherwise responsive to these requests, all documents and communications upon which you intend to rely in this litigation, including but not limited to in the course of depositions, in support of any motion, and at any hearing and trial.

19. To the extent not otherwise produced in response to these requests, all documents and communications evidencing or otherwise concerning any damages you allege you suffered concerning the allegations in your Complaint, including but not limited to all medical fees, attorneys' fees and lost wages.

20. All documents identified in your response to Defendants' First Set of Interrogatories to Plaintiff.

Dated: New York, New York
March 10, 2020

TROUTMAN SANDERS LLP

By: s/Bennet Moskowitz
Bennet Moskowitz
875 Third Avenue
New York, New York 10022
Tel: (212) 704- 6087
bennet.moskowitz@troutman.com

Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that on March 10, 2020, I served a copy of the foregoing Defendants' First Request for Production of Documents to Plaintiff, by sending them via email and Federal Express to:

Roberta A. Kaplan
Kaplan Hecker & Fink LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118

TROUTMAN SANDERS LLP

By: s/Mary Grace W. Metcalfe
Mary Grace W. Metcalfe
875 Third Avenue
New York, New York 10022
Tel: (212) 704-6029
marygrace.metcalfe@troutman.com

Attorney for Defendants