

Exhibit U

<p>1 JANE DOE NO. 6, Case No: 08-CV-80994 2 Plaintiff, 3 Vs 4 JEFFREY EPSTEIN, 5 Defendant. 6 _____/</p> <p>7 JANE DOE NO. 7, Case No. 08-CV-80993 8 Plaintiff, 9 Vs 10 JEFFREY EPSTEIN, 11 Defendant. 12 _____/ Case No: 08-CV-80811 13 Plaintiff, 14 Vs 15 JEFFREY EPSTEIN, 16 Defendant. 17 _____/</p> <p>18 JANE DOE, Case No: 08-CV-80893 19 Plaintiff, 20 Vs 21 JEFFREY EPSTEIN, 22 Defendant. 23 _____/</p> <p>24</p> <p>25</p>	<p>Page 2</p> <p>1 VIDEOTAPE D 2 DEPOSITION 3 of 4 ALFREDO RODRIGUEZ 5 6 taken on behalf of the Plaintiffs pursuant 7 to a Re-Notice of Taking Deposition (Duces Tecum) 8 9 - - - 10 APPEARANCES: 11 12 MERMELSTEIN & HOROWITZ, P.A. 13 BY: STUART MERMELSTEIN, ESQ. 14 18205 Biscayne Boulevard 15 Suite 2218 16 Miami, Florida 33160 17 Attorney for Jane Doe 2, 3, 4, 5, 18 6, and 7. 19 20 ROTHSTEIN ROSENFELDT ADLER 21 BY: BRAD J. EDWARDS, ESQ., and 22 CARA HOLMES, ESQ. 23 Las Olas City Centre 24 Suite 1650 25 401 East Las Olas Boulevard Fort Lauderdale, Florida 33301 Attorney for Jane Doe and E.W. And L.M. 26 PODHURST ORSECK 27 BY: KATHERINE W. EZELL 28 25 West Flagler Street 29 Suite 800 30 Miami, Florida 33130 31 Attorney for Jane Doe 101 and 102. 32 33</p>
<p>1 JANE DOE NO. II, Case No: 08-CV-80469 2 Plaintiff, 3 Vs 4 JEFFREY EPSTEIN, 5 Defendant. 6 _____/</p> <p>7 JANE DOE NO. 101, Case No: 09-CV-80591 8 Plaintiff, 9 Vs 10 JEFFREY EPSTEIN, 11 Defendant. 12 _____/ Case No: 09-CV-80656 13 Plaintiff, 14 Vs 15 JEFFREY EPSTEIN, 16 Defendant. 17 _____/</p> <p>18 19 20 1031 Ives Dairy Road 21 Suite 228 22 North Miami, Florida 23 July 29, 2009 24 11:00 a.m. to 5:30 p.m. 25</p>	<p>Page 3</p> <p>1 APPEARANCES: 2 3 LEOPOLD-KUVIN 4 ADAM J. LANGINO, ESQ. 5 2925 PGA Boulevard 6 Suite 200 7 Palm Beach Gardens, Florida 33410 8 Attorney for B.B. 9 10 RICHARD WILLITS, ESQ. 11 2290 10th Avenue North 12 Suite 404 13 Lake Worth, Florida 33461 14 Attorney for C.M.A. 15 16 BURMAN, CRITTON, LUTTIER & 17 COLEMAN, LLP 18 BY: ROBERT CRITTON, ESQ. 19 515 North Flagler Drive 20 Suite 400 21 West Palm Beach, Florida 33401 22 Attorney for Jeffrey Epstein. 23 24 ALSO PRESENT: 25 JOE LANGSAM, VIDEOGRAPHER 26 - - - 27 28 29 30 31 32 33 34 35 36</p>

PL-001506s 2 to 5)

<p>1 with a copy.</p> <p>2 Q. Were you the only one who was allowed to</p> <p>3 answer the phone?</p> <p>4 A. Yes.</p> <p>5 Q. I'm sorry, what would you do --</p> <p>6 A. I would leave it on the counter next to</p> <p>7 the kitchen so when I find that piece all crumbled</p> <p>8 I knew that Mr. Epstein saw the message, so we</p> <p>9 communicated like that.</p> <p>10 Q. Now, you mentioned Mr. Epstein would give</p> <p>11 you instructions during the course of the day.</p> <p>12 A. Through his assistant.</p> <p>13 Q. And his assistant was whom?</p> <p>14 A. Sarah Kellen.</p> <p>15 Q. But you didn't view her as your</p> <p>16 supervisor?</p> <p>17 A. She take orders from Mrs. Maxwell but she</p> <p>18 will tell me, Alfredo, we need to buy this, we</p> <p>19 need to do this, and so and so was coming. I</p> <p>20 couldn't talk directly to Mr. Epstein.</p> <p>21 Q. Okay. So any communications from Mr.</p> <p>22 Epstein always came through Ms. Kellen?</p> <p>23 A. Or from the office in New York. Lesley,</p> <p>24 his secretary, or somebody else, the comptroller,</p> <p>25 the architect, any lawyer.</p>	<p>Page 26</p> <p>1 A. Yes. Sometimes very short notice but,</p> <p>2 yes, I was.</p> <p>3 Q. So that varied?</p> <p>4 A. Yes.</p> <p>5 Q. Who would give you that notice?</p> <p>6 A. Mrs. Maxwell or Sarah or Larry, the</p> <p>7 pilot.</p> <p>8 Q. And then you would drive to pick them up</p> <p>9 at the airport?</p> <p>10 A. Yes.</p> <p>11 Q. And who traveled with him?</p> <p>12 A. The three pilots and some guests.</p> <p>13 Q. What do you mean by guests?</p> <p>14 A. He will have some friends from Harvard,</p> <p>15 he will have -- well, very important people that,</p> <p>16 you know, friends, acquaintances from New York or</p> <p>17 Europe because I was just told the number of</p> <p>18 people was coming on the plane.</p> <p>19 Q. Were there people who were employed by</p> <p>20 him who came regularly?</p> <p>21 A. Yes.</p> <p>22 Q. And who would they be?</p> <p>23 A. Like I said, they were the pilots, Larry</p> <p>24 Bisosky, George, and I don't remember the flight</p> <p>25 engineer, and he will have two girlfriends.</p>
<p>Page 27</p> <p>1 Q. Lawyer, what kind of instructions would</p> <p>2 you get from lawyers?</p> <p>3 A. We used to have a lot of time, for</p> <p>4 instance, the dock construction, you need to have</p> <p>5 a lot of permits in Palm Beach so they were there</p> <p>6 for that reason.</p> <p>7 Q. Okay. Now, so you would interact with</p> <p>8 the staff from New York and that would include I</p> <p>9 think you said Lesley?</p> <p>10 A. Lesley, Bella.</p> <p>11 Q. What was Lesley's position?</p> <p>12 A. Lesley is the secretary, secretary to Mr.</p> <p>13 Epstein.</p> <p>14 Q. Okay. Is that Lesley Groff?</p> <p>15 A. I believe it was, I don't remember the</p> <p>16 last name.</p> <p>17 Q. Bella, who was Bella?</p> <p>18 A. Bella was the assistant comptroller.</p> <p>19 Q. Anyone else that you dealt with in New</p> <p>20 York?</p> <p>21 A. Doug Shadow was the architect and he used</p> <p>22 to come to the house in a regular basis because we</p> <p>23 used to have a lot of projects going on.</p> <p>24 Q. Okay. Would you get advance notice when</p> <p>25 Mr. Epstein was going to arrive in Palm Beach?</p>	<p>Page 29</p> <p>1 Q. The pilot would have two girlfriends?</p> <p>2 A. Mr. Epstein. This is all people coming</p> <p>3 in the plane together.</p> <p>4 Q. Right. What do you mean by girlfriends?</p> <p>5 A. Friends, you know, that he was always</p> <p>6 having friends that he will befriend in New York,</p> <p>7 I don't know, or some other places.</p> <p>8 But I was just told -- my concern was how</p> <p>9 many people I have to feed, how many cars do I</p> <p>10 need to transport these people from the airport to</p> <p>11 the house, and to arrange accommodations in the</p> <p>12 house.</p> <p>13 Q. What about Sarah Kellen, did she travel</p> <p>14 with him?</p> <p>15 A. Yes.</p> <p>16 Q. So she was on the plane?</p> <p>17 A. Yes.</p> <p>18 MR. CRITTON: Form.</p> <p>19 BY MR. MERMELSTEIN:</p> <p>20 Q. And Ms. Maxwell?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: No, she will have different</p> <p>23 plane.</p> <p>24 BY MR. MERMELSTEIN:</p> <p>25 Q. Okay.</p>

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

CASE NO: 08-CV-80119

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 3,

CASE NO: 08-CV-80232

Plaintiff

VS.

JEFFREY EPSTEIN

Defendant

CONDENSED

JANE DOE NO. 4

CASE NO: 08-CV-80380

Plaintiff.

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5.

CASE NO: 08-CV-80381

Plaintiff

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JEFFREY EPSTEIN

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1 JANE DOE NO. 6, CASE NO: 08-CV-80994
2 Plaintiff,
3 Vs.
4 JEFFREY EPSTEIN,
5 Defendant.
6 _____/
7 JANE DOE NO. 7, CASE NO: 08-CV-80993
8 Plaintiff,
9 Vs.
10 JEFFREY EPSTEIN,
11 Defendant.
12 _____/
13 C.M.A., CASE NO: 08-CV-80811
14 Plaintiff,
15 Vs.
16 JEFFREY EPSTEIN,
17 Defendant.
18 _____/
19 JANE DOE, CASE NO: 08-CV-80893
20 Plaintiff,
21 Vs.
22 JEFFREY EPSTEIN,
23 Defendant.
24 _____/
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Page 273

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7 JANE DOE NO. 101 CASE NO: 08-CV-80591
8 Plaintiff,
9 Vs.
10 JEFFREY EPSTEIN,
11 Defendant.
12 _____/
13 JANE DOE NO. 102, CASE NO: 08-CV-80656
14 Plaintiff,
15 Vs.
16 JEFFREY EPSTEIN,
17 Defendant.
18 _____/
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34

<p>1 York house?</p> <p>2 A. He will have massages.</p> <p>3 MR. CRITTON: Form.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. And are we still talking about a habit of</p> <p>6 two a day?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: I don't know that.</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. Okay. So for the time period when you</p> <p>11 have been familiar with Mr. Epstein and known his</p> <p>12 habits, is it fair to say that he would have</p> <p>13 roughly two girls a day in that same age group</p> <p>14 wherever he was?</p> <p>15 A. Yes.</p> <p>16 MR. CRITTON: Form.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. All right. And have you talked to</p> <p>19 anybody that has given you similar information</p> <p>20 from his Island home?</p> <p>21 A. No.</p> <p>22 Q. Do you know any of the girls that have</p> <p>23 been over to his Island?</p> <p>24 A. Yes.</p> <p>25 Q. And who are they?</p>	Page 423	<p>1 Q. And is your understanding that Mr.</p> <p>2 Epstein was intimate with any of those girls?</p> <p>3 MR. CRITTON: Form.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. With all of them?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. With Sarah as well?</p> <p>11 A. Yes.</p> <p>12 MR. CRITTON: Form.</p> <p>13 BY MR. EDWARDS:</p> <p>14 Q. With Nadia?</p> <p>15 A. Yes.</p> <p>16 MR. CRITTON: Form.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. And the girls who would come over on the</p> <p>19 airplane?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. Did you ever have occasion to go into the</p> <p>24 bedroom and find the vibrators or back massagers</p> <p>25 out after Mr. Epstein was in the room with any of</p>	Page 425
<p>1 A. Nadia, the girls who used to stay at the</p> <p>2 home in El Brillo used to go over there to the</p> <p>3 Island.</p> <p>4 Q. When he would have these girls -- I guess</p> <p>5 we've kind of categorized them as the girls who</p> <p>6 would come over with him on an airplane and stay</p> <p>7 at the house.</p> <p>8 A. Yes.</p> <p>9 Q. When they would be staying at the house</p> <p>10 would he also have the local Palm Beach girls</p> <p>11 coming over that you were told to call masseuses?</p> <p>12 A. Yes.</p> <p>13 Q. So these girls that came on the airplane</p> <p>14 with him, were they also -- did they also have</p> <p>15 knowledge that these young girls were coming over</p> <p>16 to give massages?</p> <p>17 MR. CRITTON: Form.</p> <p>18 THE WITNESS: Yes, sir.</p> <p>19 BY MR. EDWARDS:</p> <p>20 Q. Okay. Who are the girls from the</p> <p>21 airplane other than Nadia that you remember?</p> <p>22 A. Sarah. There were so many, sir, I don't</p> <p>23 recall right now. But Sarah is for sure, Nadia</p> <p>24 was one of the main girlfriends, but I don't</p> <p>25 remember that.</p>	Page 424	<p>1 the girls that came over on the plane?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. So that's something that would be out</p> <p>6 after the girls that came over on the plane or the</p> <p>7 girls that came over for the massages?</p> <p>8 A. Yes.</p> <p>9 MR. CRITTON: Form.</p> <p>10 BY MR. EDWARDS:</p> <p>11 Q. And at the time when you were house</p> <p>12 manager you had a 15-year old daughter?</p> <p>13 A. Yes.</p> <p>14 Q. Did she live down here?</p> <p>15 A. In New Jersey.</p> <p>16 Q. Okay. When Alan Dershowitz was at the</p> <p>17 house I understood you to say that these local</p> <p>18 Palm Beach girls would come over to the house</p> <p>19 while he was there but you're not sure if he had a</p> <p>20 massage from any of those girls.</p> <p>21 A. Exactly.</p> <p>22 Q. And what would he do while those girls</p> <p>23 were at the house?</p> <p>24 MR. CRITTON: Form.</p> <p>25 THE WITNESS: He will read a book with a</p>	Page 426

<p>1 glass of wine by the pool, stay inside. 2 BY MR. EDWARDS: 3 Q. Did he ever talk to any of the girls? 4 A. I don't know, sir. 5 Q. Certainly he knew that they were there? 6 MR. CRITTON: Form. 7 THE WITNESS: I don't know, sir. 8 BY MR. EDWARDS: 9 Q. Do you know how Sarah Kellen knows Mr. 10 Epstein? 11 A. No, sir. 12 Q. Or how long she's known him? 13 MR. CRITTON: Form. 14 THE WITNESS: She was on board two years 15 or a year and a half before I came on board. 16 BY MR. EDWARDS: 17 Q. Okay. 18 A. So it's probably 2003 or 2. 19 Q. All right. You mentioned this Citrix 20 system. 21 A. Yes. 22 Q. Is that a system that was used to operate 23 the phones and the computers? 24 A. The computers mainly. 25 Q. All right. But you then also described</p>	<p>Page 427</p> <p>1 usually it's Yahoo dot com or at Bellsouth dot 2 net. 3 A. It was very uncommon. I don't remember, 4 sir. 5 Q. Did everybody in the -- I think you 6 called it the organization, did everybody have 7 e-mails? 8 A. Yes. 9 Q. Okay. Would that include Nadia? 10 A. Yes. 11 Q. All right. And did Mr. Epstein have an 12 e-mail? 13 A. Yes. 14 Q. Did you ever correspond with Mr. Epstein 15 by e-mail? 16 A. Yes. 17 MR. EDWARDS: You can go ahead. 18 THE WITNESS: That's the only one that I 19 remember. 20 THE VIDEOGRAPHER: Okay, we're off the 21 record. 22 (Thereupon, a recess was had.) 23 THE VIDEOGRAPHER: We're back on the 24 record with tape number four. 25 BY MR. EDWARDS:</p>
<p>Page 428</p> <p>1 some system where someone would call on the 2 telephone and that would be automatically 3 downloaded to the computer? 4 A. Yeah, you can retrieve who called in a 5 transcript written who called, what's the message, 6 the time so you have it on a piece of paper, you 7 can print it out. 8 Q. Is it your understanding that is also 9 part of the Citrix system? 10 A. Yes. 11 Q. All right. Did you have an e-mail? 12 A. Right now, yes. 13 Q. No, when you were working at -- 14 A. Yes, I did. 15 Q. -- Mr. Epstein? 16 And did Sarah Kellen have an e-mail? 17 A. Yes. 18 Q. And did all of the e-mails end the same 19 way such as Epstein's house dot com or something? 20 A. Yes. 21 Q. Okay. What was Sarah Kellen's e-mail? 22 A. I don't remember. 23 Q. What was your e-mail? 24 A. Staff house -- I don't remember, sir. 25 Q. Do you recall how it ended? I mean</p>	<p>Page 430</p> <p>1 Q. Mr. Rodriguez, what was Mr. Epstein's 2 e-mail? 3 A. Jeep project at something -- Jeep 4 project -- I can't remember it right now. 5 Q. Okay. In the course of this next 10 or 6 15 minutes -- 7 A. I can recall. 8 Q. -- if it comes to you just tell me. So 9 it was Jeep project -- 10 A. Like Jeep, the brand name Jeep, Jeep 11 project at -- I can't remember. 12 Q. Okay. Was that his only e-mail to your 13 knowledge? 14 A. No. 15 Q. He had other e-mail addresses? 16 A. Yes. 17 Q. Do you know what any of his other e-mail 18 addresses were? 19 A. No, I don't remember. 20 Q. Do you know who the carriers were for the 21 other e-mail addresses owned by Jeffrey Epstein? 22 A. No, sir. 23 Q. Whether it was Yahoo or hot mail or -- 24 A. No, none of those. 25 Q. Okay. Was this Jeep project e-mail run</p>