

# **EXHIBIT G**

IN THE CIRCUIT COURT OF THE  
SEVENTEENTH JUDICIAL CIRCUIT, IN  
AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and PAUL G.  
CASSELL,

Plaintiff(s),

vs.

ALAN M. DERSHOWITZ,

Defendant(s).

**NOTICE OF SERVING ANSWERS TO INTERROGATORIES**

Plaintiffs, Bradley J. Edwards and Paul G. Cassell, by and through their undersigned counsel, hereby file this Notice of Serving Answers to Interrogatories with the Court propounded by the Defendant, ALAN M. DERSHOWITZ, on February 11, 2015, and that a copy has been furnished to the attorney for the Defendant.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 13<sup>th</sup> day of March, 2015.

  
\_\_\_\_\_  
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Edwards, Bradley vs. Dershowitz  
Case No.: CACE 15-000072  
Notice of Serving Answers to Interrogatories

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## **ANSWERS TO INTERROGATORIES**

### **1. State verbatim or as close as possible Each statement by Dershowitz that You assert defamed You.**

**ANSWER:** Until we have transcripts of all of the statements Mr. Dershowitz has publicly made, we are unable to identify each defamatory statement. In addition, it appears that Mr. Dershowitz continues to make defamatory statements at every opportunity he has to attract the attention of an audience. However, the general defamatory themes can be illustrated based on the currently available information, by the following examples which describe the specific statements made along with the program or source publishing the statements and the approximate date on which the statement was made or published by the media:

*Politico.com -- December 31, 2014*

Dershowitz called the allegations against him included in public filings by the Plaintiffs “totally made up and totally fabricated from beginning to end.”

Additionally: “I’m planning to file disbarment charges against the two lawyers who signed this petition without even checking the manifests of airplanes or travel itineraries, et cetera.”

<http://www.politico.com/blogs/under-the-radar/2014/12/court-filing-levels-sex-claims-at-alan-dershowitz-200495.html>

*Wall Street Journal Law Blog – January 2, 2015:*

“It’s a completely, totally fabricated, made-up story,” Mr. Dershowitz told Law Blog in an interview Friday. “They made up this story out of whole cloth. I’m an innocent victim of an extortion conspiracy.”

<http://blogs.wsj.com/law/2015/01/02/dershowitz-im-an-innocent-victim-of-an-extortion-conspiracy/>

*New York Times – January 3, 2015:*

On Saturday, Mr. Dershowitz said he “categorically and unequivocally” denied all of the allegations. He said he would file disbarment proceedings against the lawyers who filed the motion, Bradley J. Edwards, a lawyer in Florida, and Paul G. Cassell, a former federal judge and a law professor at the University of Utah. “They are lying deliberately, and I will not stop until they’re disbarred,” Mr. Dershowitz said in a phone interview.



[http://www.nytimes.com/2015/01/04/us/prince-andrew-and-alan-dershowitz-are-named-in-suit-alleging-sex-with-minor.html?\\_r=0](http://www.nytimes.com/2015/01/04/us/prince-andrew-and-alan-dershowitz-are-named-in-suit-alleging-sex-with-minor.html?_r=0)

*El Nuevo Herald (The Miami Herald's afternoon paper, published in Spanish) – Jan. 2, 2015:*

Dershowitz negó las acusaciones, y las describió como parte de una conspiración para extorsionarlo. Calificó la demanda de “el documento judicial más sórdido que he visto.”

[Translation: Dershowitz denied the allegations, and described them as part of a conspiracy to extort him. He described the suit as “the most sordid judicial document I have ever seen.”]

“Ellos [Cassell y Edwards] manipularon a una muchacha joven y sugestionable que estaba interesada en el dinero”, dijo Dershowitz.

[Translation: “They [Cassell and Edwards] manipulated a very young and impressionable woman who was interested in the money”, declared Dershowitz.]

Dershowitz dijo que él se propone presentar acusaciones en contra de Edwards y Cassell. “Esta es una ofensa que puede costarles su licencia de abogados, y ellos la van a perder”, dijo Dershowitz. “Ellos van a arrepentirse del día en que hicieron esta acusación falsa en mi contra.”

[Translation: Dershowitz said that he intended to bring accusations against Edwards and Cassell. “This is a type of offense which could cost them their practicing lawyer licenses, and they are going to lose”, stated Dershowitz. “They (Cassell and Edwards) are going to regret the day [i.e., rue the day] they made a false accusation against me.”]

<http://www.elnuevoherald.com/noticias/sur-de-la-florida/article5398827.html>

*Miami Herald – January 3, 2015:*

Dershowitz denied the claims [that he was a witness to the abuse of minors by Epstein and others], describing them as part of an extortion plot. He called the filing “the sleaziest legal document I have ever seen.” “They [Edwards and Cassell] manipulated a young, suggestible woman who was interested in money,” Dershowitz said. Dershowitz said he intends to file complaints against Edwards and Cassell. “This is a disbarable offense, and they will be disbarred,” Dershowitz said. “They will rue the day they ever made this false charge against me.”

<http://www.miamiherald.com/news/local/community/broward/article5342709.html>

*BBC – January 3, 2015:*

“Well, first of all they were made in court papers that they don’t even ask for a hearing to try to prove them. They put them in court papers in order to immunize themselves from any



consequences from a defamation suit. The story is totally made up, completely out of whole cloth.

“And I will prove beyond any doubt not only that the story is totally false, but it was knowingly false: that the lawyers and the client conspired together to create a false story.”

“Q: They have said that they have tried to get testimony from you but that you have avoided their deposition requests. A: Totally false. That’s totally false. I have never been asked to be deposed.”

“I will not rest or stop until the world understands not only that I had nothing to do with any of this, but that she deliberately, with the connivance of her lawyer, lawyers, made up this story willfully and knowingly.”

<http://www.bbc.co.uk/programmes/p02g7qbc>

*Boston Globe – January 4, 2015:*

“They [Edwards and Cassell] are lying deliberately, and I will not stop until they’re disbarred,”

<http://www.bostonglobe.com/metro/2015/01/04/suit-accuses-prince-andrew-and-alan-dershowitz-sex-with-minor/0VhJMpZWMEJP3Ut8d7gexI/story.html>

(quoting phone interview with Dershowitz)

*Vice News – January 5, 2015:*

“I never met this woman, I never touched her, I wasn’t ever massaged by her — there was no contact, no contact whatsoever,” Dershowitz told CNN. “And I will prove it conclusively, and then I will bring disciplinary charges and prove that these lawyers knew that this was false, could easily have checked, and didn’t. And the end result will be that these lawyers will be disbarred.”

<https://news.vice.com/article/buckingham-palace-emphatically-denies-prince-andrew-had-sex-with-a-teenage-sex-slave>

*Huffington Post – January 5, 2015:*

On Friday, in the voicemail message for Goldman [of the Website Politico], Dershowitz said that the charges against him were “totally made up.” Goldman forwarded the message to The Huffington Post. Dershowitz called the woman a “serial liar” who he contended has a history of



making up false charges against public figures, including former President Bill Clinton. "It's just a completely categorical lie made up to gain money for her, and I hope no one takes it in any way seriously," he added. Dershowitz . . . told Politico earlier this week that he was planning legal action against the attorneys who signed off on the filing. "I'm planning to file disbarment charges against the two lawyers who signed this petition without even checking the manifests of airplanes or travel itineraries, et cetera," he said to Politico.

[http://www.huffingtonpost.com/2015/01/03/alan-dershowitz-sexual-assault\\_n\\_6410380.html](http://www.huffingtonpost.com/2015/01/03/alan-dershowitz-sexual-assault_n_6410380.html)

A copy of the voicemail left by Dershowitz can be found at: <http://big.assets.huffingtonpost.com/Dershowitz.AMR>

The voicemail includes the statement from Dershowitz: "I don't know what happened with any of the public figures [mentioned by Jane Doe No. 3], but I know that in my case I did have any contact with her. I would have been physically impossible for me to. It's just a completely, categorical lie made up out of whole cloth in order to gain money for her."

*CNN Live (with Hala Gorani) – January 5, 2015:*

"And if these lawyers, these sleazy unprofessional, unethical lawyers, Paul Cassell and Brad Edwards, if they had just done an hours' worth of research and work, they would have seen she is lying through her teeth. That's why I'm going after them, their bar cards. I'm seeking disciplinary action against them. I'm filing defamation lawsuits against them and their client."

"Ask them [Edwards and Cassell] if they have any evidence . . . They're doing it for money. She's getting money for having sold her story. She wants to sell the book. They're trying to get into this lawsuit. They see a pot of gold at the end of the rainbow. They're [Edwards and Cassell] prepared to lie, cheat, and steal. These are unethical lawyers. This is Professor Cassell who shouldn't be allowed near a student. This is Professor Cassell, who is a former federal judge, thank God he no longer wears a robe. He is essentially a crook. He is essentially somebody who's distorted the legal profession. . . ."

"And so we [Jeffrey Epstein and I] can prove it [i.e., the falsity of the allegations] without any doubt. That's what's so absurd. That's what's so strange why two experienced lawyers would file this kind of statement knowing it was untrue. These [Cassell and Edwards] are virtually the equivalent of perjurers, and they have to be taken out of the legal profession. They can't be allowed to have a bar card to victimize more innocent people. They claim to victims' rights lawyers, but they're not. They're hurting victims. They're hurting rape victims. Because they're putting forward somebody who is not a rape victim who is claiming to be a rape victim."



<http://www.cnn.com/videos/world/2015/01/05/wrn-uk-sex-abuse-allegations-alan-dershowitz-intv.cnn>

*Today Show – January 5, 2015:*

“Her lawyers Paul Cassell, a former federal judge and Brad Edwards, deliberately and willfully filed this interpleading which they knew I had no opportunity to respond to in court, without doing any investigation, if they had simply investigated the manifests of the airplanes, if they had checked my travel records, if they had asked me and I could have given the names of these people who are witnesses, they would know the stories, totally, completely false.”

“These lawyers [Edwards and Cassell] engaged in unethical behavior and should be disbarred. . . . Because they filed a paper in which they didn’t ask to try to prove it, they didn’t say we alleged, we want to prove it. They just threw it in there, it’s the legal equivalent of scribbling something on a toilet stall and then running away. They didn’t think they would be any response and they will rue the day that they filed this unethical complaint because, they I believe will be disbarred.”

“They want to just throw this stink bomb and then avoid any responsibility for it...the truth will come out and it will show these two unethical lawyers should be disbarred.”

<https://www.youtube.com/watch?v=ZXePKTws0f0>

*Boston Globe – January 6, 2015:*

Dershowitz said (in what was described as a brief phone interview Tuesday) that Jane Doe No. 3’s claims are outrageous and her attorneys, including former federal judge Paul Cassell, should be disbarred. “[Cassell] is a money-grubbing, unethical sleazebag, a former federal judge who left the bench for money. The end result of this will be bankruptcy, disbarment, and eternal disgrace.”

<http://www.bostonglobe.com/lifestyle/names/2015/01/06/alan-dershowitz-denies-woman-claim-underage-sex-vows-punish-her-attorneys/qv2kO6MJd2cD2djTSHBopO/story.html>

*Reuters – January 7, 2015:*

“Dershowitz told Reuters Monday that he would file a defamation lawsuit based on the lawyers’ public statements about the case. He also plans to file complaints with their respective states’ disciplinary boards asking that they be disbarred.”



“They [Cassell and Edwards] also said they had tried to depose Dershowitz and that he had refused, which Dershowitz called a ‘total lie.’ He said he received only one deposition request from the two lawyers five years ago, asking about his relationship with Epstein - and that it said nothing about any of the new allegations.”

<http://www.reuters.com/article/2015/01/07/us-andrew-lawsuit-dershowitz-idUSKBN0KF0DH20150107>

*Boston Globe – January 7, 2015:*

Dershowitz said the allegations against him, besides being false, contain faulty legal research, such as the age of consent in New Mexico and other states. “The truth is a defense in defamation, and I will prove that my statements about the lawyers are well-founded,” Dershowitz said. “I will not stop until they have acknowledged” the allegations against him are untrue.

<http://www.bostonglobe.com/metro/2015/01/06/sued-for-defamation-dershowitz-thrilled-chance-question-lawyers-sex-crime-accuser/21QibSrWNC343eKMadWNeL/story.html>

*Fox Business (Lou Dobbs) – January 7, 2015*

“They [Edwards and Cassell] did it for crass financial and political reasons. More to the point is [what] they didn’t do... I did the investigation in a day and was able to prove through all kinds of records that I couldn’t have been in these places. The woman is a serial liar. If they had done that investigation, they would have come to the same conclusion.”

<http://video.foxbusiness.com/v/3976630676001/alan-dershowitz-the-woman-is-a-serial-liar/?-sp=show-clips>

*Lawrence O'Donnell – January 8, 2015:*

“Right now, they [Edwards and Cassell] have accused me of these horrendous things without a single affidavit, without a single piece of evidence.”

“Why any responsible lawyer would believe her and file this kind of charge ....they willfully and deliberately made this up in order to gain a litigation advantage, [to] line their pockets with money. And they have to pay a heavy consequence for this, and they will.”



Further statements found at:

<http://www.msnbc.com/the-last-word/watch/alan-dershowitz-on-allegations--totally-false-381942851573>

*Greta van Susteren – Fox News – January 8, 2015*

“Lawyers are putting words in her [Jane Doe No. 3’s] mouth.”

“I’m going to file disciplinary charges against the lawyers [i.e., against Edwards and Cassell]. I’ve spoken to some of the world’s leading experts on ethics. And what they did was utterly unprofessional and improper.”

“I still can’t understand why they [i.e., Edwards and Cassell] would pick on me. . . . They picked on the wrong innocent victim. . . . I am not letting go of this thing until they admit that they essentially concocted this story and withdraw it.”

“I can now depose them [Edwards and Cassell]. . . . So they’re now at risk of a perjury prosecution if I can prove that they knowingly made a false allegation against me, which I think I can.”

“It [the allegation against me] is utterly irrelevant to their lawsuit. They [Edwards and Cassell] just put it in gratuitously.”

“The end will be that they [Edwards and Cassell] will be disbarred.

“These lawyers ought to be ashamed of themselves for doing this.”

<http://radio.foxnews.com/2015/01/08/greta-alan-dershowitz-this-time-its-personal/>

*Forbes – January 13, 2015:*

Dershowitz has called Cassell and his co-counsel Bradley Edwards “sleazy, unprofessional, unethical lawyers” who should have known that their client, Jane Doe #3, is “lying through her teeth.”

*American Lawyer/Palm Beach Daily Business Review – January 20, 2015:*

“They [Edwards and Cassell] want to void the plea agreement and needed to find a lawyer who knew Epstein before [the indictment], and had been on his island, his home in New Mexico, Palm Beach. I fit the bill. It was lawyer profiling.”



“Everyone is shocked that he [Cassell] would be part of this. I think he's always hated me because I'm his opposite. I'm the conventional liberal he hates: I'm against the death penalty, I'm pro-abortion rights, pro-gun control.”

*The Today Show - January 22, 2015:*

In response to a question from Savannah Guthrie that “In legal papers from the lawyers, they say you’ve had, in fact, the opportunity to be deposed,” Dershowitz responded: “They’re lying. They’re lying.”

In response to a question from Savannah Guthrie that “[t]hey show letters in which they offered to depose you,” Dershowitz responded: “And they didn’t show my letters in response saying, (a), if you ask me about my legal relationship with Epstein and I’ll be happy to answer. . . . And I responded that I would be happy to be deposed if you could give me any indication that I would be a relevant witness . . . .”

“They will be proved – all of them [i.e., Cassell, Edwards, and Jane Doe No. 3] – to be categorically lying and making up this story. And it will be a terrible thing for rape victims. They have put rape victims in a terrible position. Because when I unequivocally prove that they sat down and made this all up, tragically it will hurt all rape victims.”

“The lawyers are lying through their teeth when they say I’ve refused to be deposed. . . . We [Epstein and Dershowitz] had an academic relationship. I was never in the presence of a single, young, under-aged woman. When I was with him, it was with prominent scientists, prominent academics. And they’re just – again – lying about this. I never saw him doing anything improper. I was not a participant. I was not a witness. And I will prove it categorically.”

*Independent Online (UK) – January 22, 2015:*

" The lawyers are lying through their teeth when they say I have refused to be deposed."

*American Lawyer – January 28, 2015:*

Dershowitz has called both Cassell and Edwards, a Florida personal injury lawyer, “liars”...

<http://www.americanlawyer.com/id=1202716384195/Meet-the-Lawyer-Whos-Giving-Dershowitz-Hell#ixzz3QE8mX0Vl>



*Speech to the Dade County Bar Association – Feb. 20, 2015:*

“Of course, I didn’t know this woman [Jane Doe No. 3], I’d never heard of her, I never saw her, totally made up out of the blue, and made up by two irresponsible lawyers who hadn’t done sufficient checking. If they had called me and checked with me, they would see that I was in the places they said this happened only once each, both with my wife and my daughter and a group of witnesses and friends, including a very prominent professor at the Harvard business school. They never would have filed this drive by shooting. By the way, they didn’t even ask for a hearing, they didn’t say they would prove it.”

“Not only will I prevail in this case, because the accusation is totally – completely, completely – totally fabricated and made up. But I hope it will change the law. I hope it will make it impossible for future lawyers to just do these kind of drive by shootings, where without any real investigation, without any real preparation, they just make these allegations.”

“And yet these two lawyers – Brad Edwards, from, whose partner Rothstein is now in jail for 50 years for a Ponzi scheme involving the same case, and a guy named Cassell – filed this grievance, not grievance, just allegation again me in passing without doing even the most minimal of investigation, which would have proven conclusively that I not only didn’t, but couldn’t have, possibly done it.”

On information and belief, additional statements of an equivalent defamatory character can also be found in other publications and sources.

In addition to the specific sources cited above, many of the statements cited above were republished or rebroadcast on the internet and in other places.

In addition, on information and belief, Dershowitz made statements of an equivalent character in written or oral communications with various associates and acquaintances, including Ken Starr, Akhil Amar, and members of the faculty at the Harvard Law School.

**2. Separately for Each statement identified in response to the proceeding Interrogatory, if any part of the statement is true, identify the part that is true.**

**ANSWER:** The factual assertions contained or implied in the statements quoted in answer to Interrogatory Number 1 were not true, notably with regard to claims that Edwards and Cassell with deliberately lying, had failed to conduct an investigation of the allegations before filing them, had manipulated or conspired with Jane Doe No. 3 to make intentionally false allegations about Mr. Dershowitz, and that Plaintiffs were motivated to participate in the filing of knowingly false accusations against the Defendant by a desire to achieve personal economic gain.





PAUL G. CASSELL

STATE OF UTAH )

COUNTY OF SALT LAKE )

The foregoing instrument was acknowledged before me this 11 day of March, 2015 by Paul Cassell who is personally known to me or who has produced personal knowledge (type of identification) as identification and who did/did not take an oath.

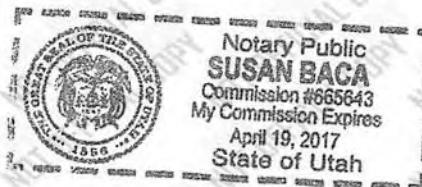


Notary Public

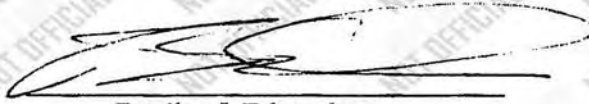
~~State of Florida at Large~~ State of Utah <sup>SMB</sup>

My Commission expires:

Commission No:







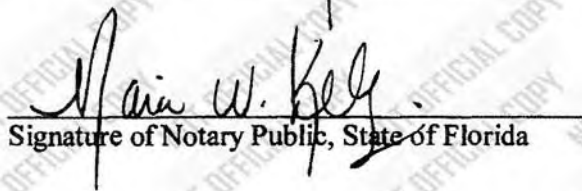
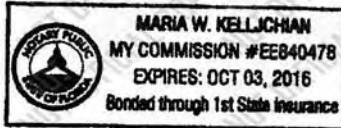
Bradley J. Edwards

STATE OF FLORIDA )

COUNTY OF Broward )

BEFORE ME, the undersigned authority, personally appeared this day Bradley J. Edwards, who ☒ is personally known to me or ☐ produced \_\_\_\_\_, as identification, and who, after being duly sworn, did state that he/she executed the foregoing Answers to First Set of Interrogatories and that the same are true and correct to the best of his knowledge

Subscribed and sworn to before me this 12<sup>th</sup> day of March, 2015.



Signature of Notary Public, State of Florida

\_\_\_\_\_  
Print / Typed Name, Notary Public

My commission expires: