

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CV-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

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DEPOSITION OF JANE DOE #4

Wednesday, September 16, 2009  
1:03 - 1:08 p.m.

250 Australian Avenue South  
Suite 115  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting

EXHIBIT 8

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1 APPEARANCES: 2 On behalf of the Plaintiff: 3 ADAM D. HOROWITZ, ESQUIRE 4 MERMELSTEIN & HOROWITZ, P.A. 18205 Biscayne Boulevard Suite 2218 5 Miami, Florida 33160 Phone: 305.931.2200 6 7 On behalf of the Defendant: 8 ROBERT D. CRITTON, JR., ESQUIRE 9 MARK T. LUTTIER, ESQUIRE 10 BURMAN, CRITTON, LUTTIER & COLEMAN, LLP 303 Banyan Boulevard Suite 400 11 West Palm Beach, Florida 33401 Phone: 561.842.2820 12 On behalf of Jeffrey Epstein: 13 JACK ALAN GOLDBERGER, ESQUIRE 14 ATTERBURY, GOLDBERGER & WEISS, P.A. 250 Australian Avenue South Suite 1400 15 West Palm Beach, Florida 33401-5012 Phone: 561.659.8300 16 17 On behalf of LM and EW: 18 WILLIAM J. BERGER, ESQUIRE 19 ROTHSTEIN, ROSENFELDT, ADLER 401 East Las Olas Boulevard Suite 1650 20 Fort Lauderdale, Florida 33301 Phone: 954.522.3456 21 22 On behalf of CMA: 23 JACK P. HILL, ESQUIRE 24 SEARCY, DENNEY, SCAROLA, BARNHART & SHIPLEY, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, Florida 33409	1 PROCEEDINGS 2 3 MR. HOROWITZ: Adam Horowitz, counsel for 4 Plaintiff, Jane Doe 4. 5 MR. CRITTON: Cindy, what time is it? 6 THE COURT REPORTER: It is 1:03. 7 MR. BERGER: William J. Berger for LM and 8 EW. 9 MR. HILL: Jack Hill for CMA. 10 MR. LANGINO: Adam Langino from 11 Leopold Kuvvin on behalf of BB. 12 MR. LUTTIER: Mark Luttier on behalf of 13 Burman, Critton, Luttier & Coleman for the 14 Defendant. 15 MR. CRITTON: Robert Critton on behalf of 16 Defendant, Jeffrey Epstein. 17 MR. HOROWITZ: This is Adam Horowitz. 18 We're canceling today's deposition. Before 19 appearing here today, we had a stipulation with 20 Defense counsel that Mr. Jeffrey Epstein, the 21 Defendant, would not be here. He would not 22 cross paths with our client. 23 And immediately as we were approaching the 24 deposition room, he made face-to-face contact 25 with our client. He was just feet away from

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1 APPEARANCES CONTINUED... 2 3 On behalf of BB: 4 ADAM J. LANGINO, ESQUIRE 5 LEOPOLD KUVIN 6 2925 PGA Boulevard Suite 200 7 Palm Beach Gardens, Florida 33410 Phone: 561.515.1400 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	1 her and intimidated her, and for that reason 2 we're not going forward. 3 MR. CRITTON: I didn't see any contact 4 because I, obviously, was not out there. We 5 started at about -- when you came in it was 6 approximately 1:03. Mr. Epstein has an office 7 here at the Florida Science Foundation. Had 8 you been here at 1:00, your paths never would 9 have crossed because Mr. Epstein was leaving 10 the building. I instructed him to leave the 11 building so that he would not be here. 12 He was going to appear by way of Skype so 13 that he could be on a video camera so that he 14 could see this. 15 (Mr. Goldberger entered the room.) 16 MR. CRITTON: Had you been here on time, 17 and not faulting, I am just saying had you been 18 here on time at 1:00, as everyone else seemed 19 to be here at least get here before you did, 20 Adam, you and your client, your paths never 21 would have crossed. 22 I directed Mr. Epstein to leave the 23 building so he would not be here so that there 24 would be no way that your paths could have 25 crossed. It was neither my intent nor was it

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<p>1 my client's intent specifically, because I also  2 advised him that he was not to cross paths, not  3 to have any contact with your client, and  4 certainly by our agreement not to be here today  5 for the deposition.</p> <p>6 MR. HOROWITZ: And at approximately 1:00  7 is exactly when my client crossed paths with  8 Jeffrey Epstein. And not only did he cross  9 paths but he proceeded to stare her down just  10 feet away from her. For that reason she became  11 an emotional wreck and cannot proceed with the  12 deposition. She's simply not in an emotional  13 state to do so.</p> <p>14 And in addition Mr. Epstein violated the  15 agreement between counsel that he would not  16 cross paths or come into contact with our  17 client. And it will be also for the criminal  18 court judge to decide whether he has violated a  19 no-contact order. I have nothing else to say.</p> <p>20 MR. CRITTON: Again I instructed  21 Mr. Epstein to leave the building so absolutely  22 no contact could occur between he and  23 Mr. Horowitz and his client nor anyone else.  24 Until the court, until either Judge Marra or  25 Judge Johnson ruled on the issue as to whether</p>	<p>Page 6</p> <p>1 C E R T I F I C A T E  2  3 STATE OF FLORIDA  4 COUNTY OF PALM BEACH  5  6 I, Cynthia Hopkins, Registered Professional  7 Reporter and Florida Professional Reporter, State of  8 Florida at large, certify that I was authorized to  9 and did stenographically report the foregoing  10 proceedings and that the transcript is a true and  11 complete record of my stenographic notes.  12  13 Dated this 16th day of September, 2009.</p> <p>14  15  16  17  18  19  20  21  22  23  24  25</p> <p style="text-align: right;"><i>Cynthia J. Hopkins</i>    Cynthia Hopkins, RPR</p>
<p>1 or not he could appear at the depositions of  2 not only Jane Doe 4 but any other individuals,  3 so you do what you need to do.</p> <p>4 MR. HOROWITZ: Off the record.  5 (The Deposition was concluded.)</p> <p>6  7  8  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25</p>	<p>Page 7</p>

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