

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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Related Cases:

08-80232, 08-80380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092,

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**JANE DOE NOS.' 2, 3, and 5-8 OBJECTION TO SUBPOENA DUCES TECUM  
DATED NOVEMBER 13, 2009 ISSUED TO PRESIDENTIAL WOMEN'S CENTER**

Plaintiffs, Jane Doe Nos. 2, 3, and 5-8, by and through their undersigned counsel, and pursuant to Federal Rules of Civil Procedure 26 and 45, hereby object to the Subpoena Duces Tecum issued by Jeffrey Epstein to the records custodian of Presidential Women's Center dated November 13, 2009 on the basis that said subpoena is not *reasonably calculated* to lead to the discovery of admissible evidence and constitutes an invasion of the privacy rights of the plaintiffs. There is no evidence or other indication whatsoever to indicate that Jane Doe Nos. 2, 3, and 5-8 have had an *abortion* at Presidential Women's Center, 100 Northpoint Parkway, West Palm Beach, Florida 33401 or otherwise been seen or treated at that facility. Accordingly, this subpoena seeking records relating to these Plaintiffs is a pure "shot in the dark" attempt to obtain discovery, rather than the reasonably calculated discovery effort as required by the Federal Rules of Civil Procedure. Pursuant to this objection, Plaintiffs Nos. 2, 3, and 5-8 request that non-party

Presidential Women's Center not answer any questions or produce any records in response to the Subpoena Duces Tecum in the absence of a Court Order requiring such disclosure.

Dated: November 25, 2009

Respectfully submitted,

By: s/ Adam D. Horowitz  
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**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true copy of the foregoing has been sent to the following via e-mail transmission, this 25th day of November, 2009:

Louis Silber, Esq.  
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s/ Adam D. Horowitz