

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80380-MARRA-JOHNSON

JANE DOE NO. 4,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES

Plaintiff, JANE DOE 4, by and through their undersigned counsel, and pursuant to Federal Rules of Civil Procedure Rule 33, hereby responds to Defendant, JEFFREY EPSTEIN'S First Set of Interrogatories to Plaintiff as follows:

General Objections

1. Plaintiff objects to Defendant's Interrogatories to the extent that the Interrogatories call for the disclosure of information protected by the attorney-client privilege, attorney work-product doctrine, or other applicable privilege or immunity, whether created by statute or common law. Plaintiff claims such privileges and protections to the extent implicated by each Interrogatory, and excludes privileged and protected information from any responses to Defendant's discovery. Any disclosure is inadvertent and is not intended to waive those privileges or protections, which are specifically reserved.

2. Plaintiff objects to Defendant's Interrogatories to the extent that same are vague, ambiguous, incomprehensible and/or overly broad.

EXHIBIT "A"

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14. Please state if you (or parents or guardian on your behalf) have ever been a party, either plaintiff or defendant, in a lawsuit other than the present matter, and, if so, state whether you were plaintiff or defendant, the nature of the action, and the date and court in which such suit was filed.

Answer:

None.

15. List all dates you allege you were at Mr. Epstein's home in Florida, include date, time arrived and left, the name(s) of anyone who went with you to the home when you were there, the time spent with Mr. Epstein and the name(s) and address of any individuals who were present in the house with Mr. Epstein and you.

Answer:

Redacted

16. State in detail how you came to be at Mr. Epstein's home on each occasion, i.e. did someone bring you or ask you if you would or wanted to go; if so, state the name and address of that individual and what he/she told you and the purpose of your visit.

Answer:

Plaintiff remembers other friends talking about giving massages to the Defendant at his estate, and that they were paid for it. Her friends, including [REDACTED] and [REDACTED] and [REDACTED] invited her to go, which she eventually did (Jane Doe 7) (Jane Doe 3)

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25. Please describe any statements made to you by any federal or state law enforcement agent or prosecutor regarding the availability of civil remedies against Mr. Epstein and regarding whether there would be any benefit from your voluntary cooperation with law enforcement.

VERIFICATION

Jane Doe 4 being duly sworn, deposes and says that the foregoing answers to interrogatories are true and correct to the best of her knowledge, information and belief.

Jane Doe 4

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) ss
)

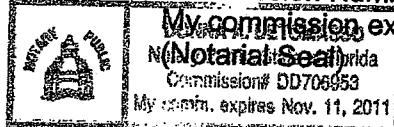
SWORN TO AND SUBSCRIBED before me this 23 day of JANUARY, 2008 by
Jane Doe 4, who is personally known to me or has produced the
following identification PLD C which is current or has been issued
within the past five years and bears a serial or other identifying number.

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Donna A. DeTOMASO
Print Name

Dorothy Q. DeTomaso
Signature

NOTARY PUBLIC - STATE OF FLORIDA
Commission Number: 00706953



My commission expires
Notarial Seal 

11-11-11

Montana Seal
Commission# DD705953

My exam. expires Nov. 11, 2011

By:

ROBERT D. CRITTON, JR., ESO

Florida Bar No. 224162

rcrit@bclclaw.com

MICHAEL J. PIKE, ESQ.

Florida Bar #617296

mpike@bclclaw.com

BURMAN, CRITTON, LUTTIER & COLEMAN

515 N. Flagler Drive, Suite 400

West Palm Beach, FL 33401

561/842-2820 Phone

561/515-3148 Fax

(Counsel for Defendant Jeffrey Epstein)

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing has been served by fax and U.S. Mail to the following addressees on this 11 day of December, 2008:

Adam D. Horowitz, Esq.
Jeffrey Marc Herman, Esq.
Stuart S. Mermelstein, Esq.
18205 Biscayne Boulevard
Suite 2218
Miami, FL 33160
305-931-2200
Fax: 305-931-0877
ahorowitz@hermanlaw.com
jherman@hermanlaw.com
lrivera@hermanlaw.com

Jack Alan Goldberger
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
561-659-8300
Fax: 561-835-8691
jagesq@bellsouth.net
Co-Counsel for Defendant Jeffrey Epstein