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1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
2
3 CASE NO.: 08-CV-80119-MARRA/JOHNSON
4

JANE DOE NO. 2,

Plaintiff,

-vs- VOLUME I OF III

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

VIDEO-CONFERENCED AND VIDEOTAPED DEPOSITION OF
JANE DOE NO. 4

Tuesday, October 27, 2009
11:11 - 6:05 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

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1 APPEARANCES:
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7 On behalf of Jane Does 1 through 8:
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"EXHIBIT
B"

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 13 On behalf of C.M.A.:
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 16 Lake Worth, Florida 33461
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17 (Via Telephone)
 18 On behalf of the Defendant, Jeffrey Epstein:
 19 ROBERT D. CRITTON, JR., ESQUIRE
 MARK T. LUTTIER, ESQUIRE
 20 BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
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 21 Suite 400
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23
 24 ALSO PRESENT: Jeffrey Epstein, via video conference
 Jeff Abbott, Videographer
 25 Visual Evidence, Incorporated

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PROCEEDINGS

Deposition taken before Cynthia Hopkins,
Registered Professional Reporter and Florida
Professional Reporter, and Notary Public in and for
the State of Florida at Large, in the above cause.

THE VIDEOGRAPHER: This is the 27th day of
October, 2009. The time is 11:11 a.m. This is
the videotape deposition of Jane Doe No. 4 in
the matter of Jane Doe No. 4 versus Epstein.

This deposition is being held at 250 South
Australian Avenue, West Palm Beach, Florida.

My name is Jeff Abbott. I am the
videographer representing Visual Evidence,
Incorporated.

Will the attorneys please announce their
appearances for the record.

MR. HOROWITZ: Sure. Adam Horowitz,
counsel for Plaintiff, Jane Doe No. 4.

MR. LUTTIER: Mark Luttier, counsel for
Jeff Epstein.

MR. CRITTON: Robert Critton on behalf of
Mr. Epstein.

MR. HOROWITZ: Let me just do a --

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MR. WILLITS: Rick Willits on behalf of
Carolyn Andriano.

MR. HOROWITZ: Let me just note a brief
objection. Per the letter that we have written
to you, we intend to object and instruct our
client not to answer to the extent there are
questions whose answers will implicate Rule
412. The issue of Rule 412 is, is before the
court in a pending motion, and before the depo
was set, we fully briefed the issue before the
court and have noted our intent to object to
questions which implicate that question -- that
rule.

MR. CRITTON: 412 deals with the --

MR. HOROWITZ: Sexual, sexual history.

MR. CRITTON: -- sexual history, and our,
we briefed it --

MR. HOROWITZ: We briefed it.

MR. CRITTON: -- on both sides, and our
position is, is Judge Johnson was pretty clear
in her order with regard to CME and with regard
to this medical exam that was done by Dr. Hall
in the Carolyn Andriano case as to why it's
relevant, and why it's material and why it's
important. We understand your position, don't

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agree with it, and we'll proceed.

2 MR. LUTTIER: Ready?
3 THE COURT REPORTER: Yes.
4 MR. LUTTIER: Please state your name. Oh,
5 you have to swear her in.

6 Thereupon,
7 (JANE DOE NO. 4)
8 Having been first duly sworn or affirmed, was
9 examined and testified as follows:

10 THE WITNESS: Yes.

11 DIRECT EXAMINATION

12 BY MR. LUTTIER:

13 Q. What is your name, ma'am?

14 A. Jane Doe No. 4.

15 Q. And how do you spell your middle name?

16 A. (Witness spells middle name.)

17 Q. And your last name is -- (Mr. Luttier
18 spelled the witness's last name.)

19 A. Yes.

20 Q. Okay. Jane Doe No. 4, when were you born?

21 A. June 6, 1987.

22 MR. WILLITS: I can barely hear the
23 witness. Can we get it a little closer to her?

24 MR. HOROWITZ: Yes.

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1 BY MR. LUTTIER:

2 Q. Have you ever been known by any other
3 name?

4 A. No.

5 Q. Have you ever been deposed before?

6 A. Deposed?

7 Q. That is have your deposition taken as
8 we're doing today.

9 A. No.

10 Q. Have you ever given anybody any kind of
11 statement under oath before?

12 A. The police reports, you mean?

13 Q. Could be, yeah.

14 A. Yeah.

15 Q. All right. Do you know what the
16 significance of an oath is?

17 A. Yeah, where you tell the truth.

18 Q. Okay. You understand you are under oath
19 today?

20 A. Yes.

21 Q. Do you know what the significance of
22 violating an oath is?

23 A. (Witness shakes head.)

24 Q. Like, if you don't tell the truth when
25 you're under oath, do you know --

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1 A. Yeah, you're in trouble.

2 Q. Okay. You know that's against the law to
3 do that?