

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE.NO. 2,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 3,

CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 4,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5,

CASE NO.: 08-CV-80381-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Carolyn Margaret Andriano, et al vs. Jeffrey Epstein
Case No.:08-CV-80119-MARRA/JOHNSON
Emergency Motion for Protective Order Regarding the
Taking of Her Deposition on August 14, 2009
Page 2

JANE DOE NO. 6,

CASE NO.: 08-CV-80994-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE NO. 7,

CASE NO.: 08-CV-80993-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

C.M.A.,

CASE NO.: 08-CV-80811-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE,

CASE NO.: 08-CV-80893-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

Carolyn Margaret Andriano, et al vs. Jeffrey Epstein
Case No.:08-CV-80119-MARRA/JOHNSON
Emergency Motion for Protective Order Regarding the
Taking of Her Deposition on August 14, 2009
Page 3

DOE II, CASE NO.: 09-CV-80469-MARRA/JOHNSON

Plaintiff,
vs.

JEFFREY EPSTEIN,

Defendant.
_____ /

JANE DOE NO. 101, CASE NO.: 09-CV-80591-MARRA/JOHNSON

Plaintiff,
vs.

JEFFREY EPSTEIN,

Defendant.
_____ /

JANE DOE NO. 102, CASE NO.: 09-CV-80656-MARRA/JOHNSON

Plaintiff,
vs.

JEFFREY EPSTEIN,

Defendant.
_____ /

**PLAINTIFF, CAROLYN MARGARET ANDRIANO'S, EMERGENCY MOTION FOR
PROTECTIVE ORDER REGARDING THE TAKING OF HER DEPOSITION ON
AUGUST 14, 2009**

Plaintiff, CAROLYN MARGARET ANDRIANO, by and through her undersigned attorneys, hereby files her Emergency Motion for Protective Order Regarding the Taking of Her Deposition on August 14, 2009, and in support there of states as follows:

Carolyn Margaret Andriano, et al vs. Jeffrey Epstein
Case No.:08-CV-80119-MARRA/JOHNSON
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Page 4

1. On August 5, 2009, Defendant, JEFFERY E. EPSTEIN, unilaterally scheduled the deposition of Plaintiff, CAROLYN MARGARET ANDRIANO, for August 14, 2009, at 10:00 a.m. (Attached hereto as Exhibit "1").

2. Plaintiff has been hospitalized for the last two weeks suffering from serious illnesses, including undergoing extensive thoracic surgery. It is not expected that Plaintiff will be released from the hospital before August 24, 2009, and potentially later. There is also the possibility that Plaintiff will need to be admitted to an in-patient nursing home/rehabilitation hospital following her discharge from the acute care setting in which she is currently residing to convalesce from her illnesses and resulting surgery.

3. Needless to say, it is not expected that Plaintiff will be out of the hospital by August 14, let alone be in any condition that would permit the taking of her deposition. Accordingly, Plaintiff seeks the entry of a protective order preventing her deposition from going forward until after Plaintiff is discharged from the hospital and/or any nursing home/rehabilitation hospital. The undersigned will keep counsel for EPSTEIN informed as to Plaintiff's expected discharge date in order to facilitate rescheduling her deposition.

WHEREFORE, Plaintiff, CAROLYN MARGARET ANDRIANO, respectfully requests that this Court enter a protective order preventing the taking of her deposition until after she is discharged from the hospital and/or any nursing home/rehabilitation hospital.

Carolyn Margaret Andriano, et al vs. Jeffrey Epstein
Case No.:08-CV-80119-MARRA/JOHNSON
Emergency Motion for Protective Order Regarding the
Taking of Her Deposition on August 14, 2009
Page 5

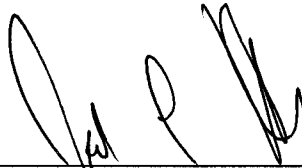
CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

Counsel for the movant has conferred via e-mail with counsel for the Defendant regarding his position on the instant motion and has been informed that counsel for Defendant is not in agreement with any of the relief requested herein.

/s/ Jack P. Hill

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of August, 2009, I filed the foregoing with the Clerk of the Court and send copies to all counsel of record via e-mail.



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Carolyn Margaret Andriano, et al vs. Jeffrey Epstein
Case No.:08-CV-80119-MARRA/JOHNSON
Emergency Motion for Protective Order Regarding the
Taking of Her Deposition on August 14, 2009
Page 6

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

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

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.

JANE DOE NO. 3,

CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.

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

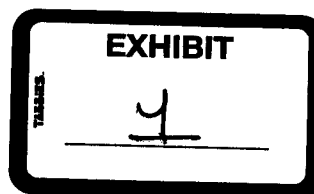
JANE DOE NO. 4,

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.



CASE NO.: 08-CV-80381-MARRA/JOHNSON

JANE DOE NO. 5,

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-80994-CIV-MARRA/JOHNSON

JANE DOE NO. 6,

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-80993-CIV-MARRA/JOHNSON

JANE DOE NO. 7,

Plaintiff,

JEFFREY EPSTEIN

Defendant.

CAROLYN MARGARET
ANDRIANO,

Plaintiff,

JEFFREY EPSTEIN

Defendant.

CASE NO.: 08-80811-CIV-MARRA/JOHNSON

JANE DOE,

CASE NO.: 08-80893-CIV-MARRA/JOHNSON

Plaintiff,

JEFFREY EPSTEIN et al,

Defendants.

DOE II,

CASE NO.: 09-80469-CIV-MARRA-JOHNSON

Plaintiff,

JEFFREY EPSTEIN et al,

Defendants.

JANE DOE NO. 101,

CASE NO.: 09-80591-CIV-MARRA-JOHNSON

Plaintiff,

JEFFREY EPSTEIN

Defendant.

JANE DOE NO. 102,

CASE NO.: 09-80656-CIV-MARRA/JOHNSON

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the undersigned attorney will take the videotaped deposition of:

DEPONENT

Carolyn Margaret Andriano
c/o Searcy Denney Scarola
Barnhart & Shipley P.A.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409

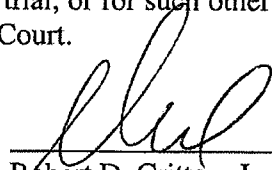
**DATE &
TIME**

August 14, 2009
at 10:00 a.m.

**LOCATION OF
DEPOSITION**

Burman Critton Luttier &
Coleman LLC
515 North Flagler Drive
Suite 400
West Palm Beach, FL 33401

upon oral examination, before U.S. Legal Support, a Notary Public, or any other officer authorized by law to take depositions in the State of Florida. The oral examination is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the applicable Statutes of Rules of Court.

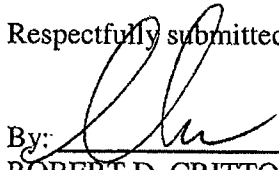


Robert D. Critton, Jr.
Attorney for Defendant Epstein

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served this day on all counsel of record identified on the following Service List via e-mail and U.S. Mail on this 5th ay of August, 2009.

Respectfully submitted,

By: 

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Certificate of Service
Jane Doe No. 2 v. Jeffrey Epstein
Case No. 08-CV-80119-MARRA/JOHNSON

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08-80994

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08-08804*

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*Counsel for Plaintiffs in Related Cases
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jagesq@bellsouth.net

Counsel for Defendant Jeffrey Epstein

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE NO. 3,

CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE NO. 4,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE NO. 5,

CASE NO.: 08-CV-80381-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE NO. 6,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80994-MARRA/JOHNSON

JANE DOE NO. 7,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80993-MARRA/JOHNSON

C.M.A.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80811-MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80893-MARRA/JOHNSON

DOE II,

CASE NO.: 09-CV-80469-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE NO. 101,

CASE NO.: 09-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE NO. 102,

CASE NO.: 09-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

**ORDER ON PLAINTIFF, CAROLYN MARGARET ANDRIANO'S, MOTION FOR
PROTECTIVE ORDER REGARDING THE TAKING OF HER DEPOSITION ON
AUGUST 14, 2009**

This matter came before the Court upon Plaintiff, CAROLYN MARGARET ANDRIANO's Motion for Protective Order Regarding the Taking of Her Deposition on August 14, 2009. Having considered the motion, it is hereby ORDERED and ADJUDGED that:

Plaintiff's motion is hereby granted. Defendant's deposition of Plaintiff shall be postponed until Plaintiff is discharged from the hospital.

DONE AND ORDERED this _____ day of _____, 2009.

LINNEA R. JOHNSON
United States Magistrate Judge

Copies to all Counsel of Record