

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

JANE DOE NO.2,

Plaintiff,

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

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.

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JANE DOE NO. 6,

Plaintiff,
vs.

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

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 7,

Plaintiff,
vs.

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

JEFFREY EPSTEIN,

Defendant.

C.M.A.,

Plaintiff,
vs.

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

JEFFREY EPSTEIN,

Defendant.

JANE DOE,

Plaintiff,
vs.

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

JEFFREY EPSTEIN, et al.,

Defendants.

DOE II,

Plaintiff,
vs.

CASE NO.; 08-CV-80469-MARRA/JOHNSON

JEFFREY EPSTEIN, et al,

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Defendants.

JANE DOE NO. 101,

CASE NO.; 08-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 102,

CASE NO.; 08-CV-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Defendant, Jeffrey Epstein's Response in Opposition to Jane Doe Numbers 2-7 Notice Of Joinder In Plaintiffs' Jane Does 101 and 102's Motion for No-Contact Order, with Incorporated Memorandum of Law

Defendant, JEFFREY EPSTEIN, (hereinafter "EPSTEIN") by and through his undersigned attorneys, hereby files his Response in Opposition to Jane Doe Numbers 2-7 Notice of Joinder In Plaintiffs' Jane Does 101 and 102's Motion for No-Contact Order, with Incorporated Memorandum of Law. In support, EPSTEIN states:

I. Introduction

1. Jane Doe 101 and 102 filed their Motion for No-Contact Order on May 22, 2009. (DE 113).

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2. Epstein filed his Response In Opposition to the Motion for No Contact Order on May 29, 2009. (DE 127). The arguments set forth in the Response In Opposition to the Motion for No-Contact Order are incorporated herein by reference as if same were outlined herein.

3. Jane Doe 101 and 102 filed their Reply to Epstein's Response to their Motion for No-Contact Order on June 4, 2009. (DE 136).

4. On June 8, 2009, Jane Doe Numbers 2-7 filed their Notice of Joinder in Plaintiffs' Jane Does 101 and 102's Motion for No-Contact Order. (DE 45)(the "Notice of Joinder").

II. Response

5. The Notice of Joinder is unwarranted and simply a waste of attorney time and judicial resources. However, it does once again telegraph for this court Plaintiffs' collective efforts to stall this case by any means possible.

6. The Notice of Joinder is riddled with inaccuracies and misstatements. For example, Haley Robson has not been asked to gather any information relative to Jane Doe 4 and Jane Doe 7. See Affidavit of Haley Robson, **Exhibit "A"**. Moreover, Haley Robson only spoke to Jane Doe 7 when approached by her and her boyfriend at a local West Palm Beach bar. Id. At that time, Haley Robson told Jane Doe 7 that she "[] could not believe she was bringing a lawsuit against Jeffrey Epstein, as [Haley Robson knew] she has taken money from a number of older men and even traveled to Chicago with one of them." Id. Haley Robson also told Jane Doe 7 that she intended to tell the truth about everything she knew about Jane Doe 7 and her escapades with other men. Id. As such, any contact was initiated by Jane Doe 7 in a public forum.

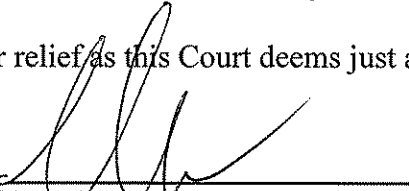
7. It is clear from the attached Affidavit that at least Jane Does 4 and 7 have made misstatements in order to stall this case. As to Jane Doe numbers 2, 3, 5, and 6, no supporting

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allegations exist to substantiate the entry of any such order. Plaintiffs simply make much to do about nothing.

8. For the reasons set forth herein and in Epstein's Response Motion (DE 127), Epstein asks that this Court deny Plaintiff's Notice/Motion for No-Contact Order.

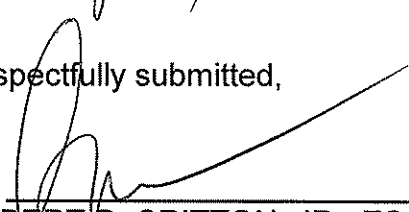
Wherefore, Defendant, Jeffrey Epstein, requests that this court deny the Notice/Motion for No-Contact Order, and for such other and further relief as this Court deems just and proper.

By: 
MICHAEL J. PIKE, ESQ.
Florida Bar #617296

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following Service List in the manner specified by CM/ECF on this 30 day of July, 2009

Respectfully submitted,

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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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IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY FLORIDA

JANE DOE,

CASE NO. 502008CA006596XXXXMB

Plaintiff,

vs.

JEFFREY EPSTEIN,
HALEY ROBSON,
and SARAH KELLEN

Defendants.

AFFIDAVIT OF HALEY ROBSON

STATE OF FLORIDA)
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared HALEY ROBSON, who after being first duly sworn, deposes and says:

1. My name is Haley Robson.
2. I am and have been represented by McIntosh, Sawran, Peltz & Cartaya, P.A.
3. I was a Defendant in the case styled, Jane Doe v. Jeffrey Epstein, Haley Robson and Sarah Kellen, Case No. 502008CA006596XXXXMB AB.
4. I have read the document entitled "Plaintiffs Jane Does' 2-7 Notice of Joinder in Plaintiffs' Jane Does 101 and 102's Motion for No-Contact Order."
5. I am writing this affidavit in response to the statements within the motion that refer to me.
6. I have not had any contact with Jeffrey Epstein since he was arrested.
7. I have not been asked by Mr. Epstein or his attorneys to gather information about Jane Doe 4 and Jane Doe 7.

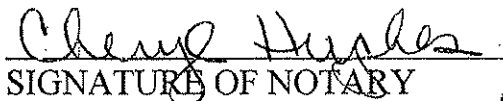
"A"

8. I am not being supported by Mr. Epstein nor did I say that to Jane Doe 4 and 7.
9. Based on the statements within the motion, I can identify Jane Doe 7 and only spoke to her when she and her boyfriend approached and confronted me at Dr. Feelgood's.
10. When Jane Doe 7 and her boyfriend confronted me, I told her that I could not believe she was bringing a lawsuit against Jeffrey Epstein, as I know that she has taken money from a number of older men and even traveled to Chicago with one of them.
11. I also told Jane Doe 7 and her boyfriend that I intended to tell the truth about everything I know about her and what she has done with other men.
12. I will tell the truth about Mr. Epstein, Jane Doe 4, Jane Doe 7 or anyone else that I am asked about. I resent any suggestion that I would lie to assist Mr. Epstein.

FURTHER AFFIANT SAYETH NAUGHT.


HALEY ROBSON

SWORN TO AND SUBSCRIBED before me this 2nd day of JULY, 2009, by Haley Robson (name of person), who is personally known to me or who has produced FL Drivers License (type of identification) as identification.


SIGNATURE OF NOTARY

PRINTED NAME OF NOTARY

