

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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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

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**EPSTEIN'S REPLY TO PLAINTIFFS' RESPONSE TO MOTION TO COMPEL  
PRESIDENTIAL WOMEN'S CENTER TO COMPLY WITH SUBPOENA DUCES TECUM  
AND INCORPORATED MOTION TO COMPEL PRESIDENTIAL WOMEN'S CENTER TO  
COMPLY WITH SUBPOENA DUCES TECUM REGARDING JANE DOE NO. 4**

Defendant, Jeffrey Epstein (“Epstein”), submits this reply to Plaintiffs’, Jane Doe Nos. 2, 3 and 5-8 (“Plaintiffs”), Response to Epstein’s Motion to Compel Presidential Women’s Center to Comply with Subpoena Duces Tecum (DE #442) and also moves to compel Presidential Women’s Center to Comply with Subpoena Duces Tecum Regarding Jane Doe No. 4, and states:

1. On December 2, 2009, Epstein filed a Motion to Compel Presidential Women’s Center to Comply with Subpoena Duces Tecum (“Motion to Compel”) (DE #431).
2. Since the filing of the Motion to Compel (DE #431), Presidential Women’s Center notified undersigned counsel that it does not have any records for Jane Doe Nos 2, 3, 5, 6 and 8.<sup>1</sup>

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<sup>1</sup> Epstein did not serve a subpoena on Presidential Women’s Center for Jane Doe No. 7.

3. Thus, unless circumstances change in the future, the issues in Epstein's Motion to Compel and the subpoenas to Presidential Women's Center regarding Jane Doe Nos. 2, 3, 5, 6 and 8 are moot at the current time.

**MOTION TO COMPEL PRESIDENTIAL WOMEN'S CENTER TO COMPLY WITH SUBPOENA DUCES TECUM REGARDING JANE DOE NO. 4**

4. In her deposition, Jane Doe No. 4 testified that she had three abortions, at least two of which was performed at Presidential Women's Center. See 10/27/09 Deposition of Jane Doe No. 4 at 311-313, excerpt attached as **Exhibit A**.

5. On November 13, 2009, Epstein issued a subpoena (attached as **Exhibit B**) to Presidential Women's Center for records relating to Jane Doe No. 4.

6. Jane Doe No. 4 did not object to said subpoena.

7. Presidential Women's Center represented they will not produce records without a court order or a signed HIPAA release from the patient.

8. On December 18, 2009, counsel for Epstein requested Jane Doe No. 4 provide an executed release for Presidential Women's Center. To date, no release has been received.

9. Accordingly, Epstein requests the Court enter an order compelling Presidential Women's Center to comply with the November 13, 2009 subpoena duces tecum within five (5) days of the Court's order.

10. This discovery is obviously relevant and discoverable and, again, Jane Doe No. 4 (also represented by counsel for Jane Doe Nos. 2, 3 and 5-8) did not object to the subpoena. As the Court stated in its September 4, 2009 Order (DE #289), “[u]nder these circumstances, where Plaintiff is seeking to recover expenses associated with these complex medical issues, full knowledge of Plaintiff's past and present medical, psychological, familial and social histories is essential.” See DE #289 at 4; see also DE #377 at 10 (“As a global matter, Plaintiffs clearly and

unequivocally place their sexual history in issue by their allegations that Epstein's actions in this case has negatively affected their relationships.... To deny Epstein this discovery [regarding past sexual history], would be tantamount to barring him from mounting a defense.”).

WHEREFORE, Epstein respectfully requests the Court enter an order compelling Presidential Women's Center to produce documents responsive to the subpoena *duces tecum* regarding Jane Doe No. 4 and attached to this Motion as Exhibit A within five (5) days of the Court's order and grant any additional relief the Court deems just and proper.

**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 29th day of December, 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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