

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Related Cases:

08-80232, 08-80380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092,

JOINT AGREED PROTECTIVE ORDER

Plaintiffs Jane Does 2-8, Jane Doe and Carolyn Andriano (CMA) ("Plaintiffs") and their counsel and Defendant and his counsel, in the above-styled cases have agreed to the entry of this Protective Order pursuant to United States Magistrate Judge Linnea R. Johnson's October 28th, 2009 Order. [DE 377].

1. As to the tax returns and supporting documentation to be produced by Plaintiffs, the parties have agreed that information contained in such documents may be disclosed, summarized, described or otherwise communicated or made available in whole or in part only to the following persons: (a) Defendant, attorneys for the Defendant, and regular employees of such attorneys assisting in the conduct of this action, and outside photocopying and document services companies, to use only for purposes of this litigation; (b) retained experts assisting counsel for Defendant in this action, and (c) used in discovery including depositions of witnesses

EXHIBIT
"A"

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and referenced in court filings to the extent it is relevant and necessary. To the extent the information has been obtained through other sources, this order shall not apply.

2. As to any documents which were to be produced by a Plaintiff depicting Plaintiff in photos, movies, DVDs, videotapes or similar type of visual documents in which she performs or has performed sexual acts or simulated sex acts, the parties have agreed that the actual documents should not be produced and in place thereof, Plaintiff shall provide a written description, to include identifying the type of documents, the names and addresses of all individuals depicted, date(s) of documents, the acts depicted, location of depiction, and the person(s) who made the document. Because the actual documents are not to be produced, the parties have agreed that information contained in such disclosures may be disclosed, summarized, described or otherwise communicated or made available in whole or in part only to the following persons: (a) Defendant, attorneys for the Defendant, and regular employees of such attorneys assisting in the conduct of this action, and outside photocopying and document services companies, to use only for purposes of this litigation; (b) retained experts assisting counsel for Defendant in this action, and (c) used in discovery including depositions of witnesses and referenced in court filings to the extent it is relevant and necessary. To the extent the information has been obtained through other sources, this order shall not apply.

3. As to any documents that are produced in response to Request for Production nos. 10, 11, 17 and 18 and any answers in response to Interrogatory nos. 18, 19, 20, and 21, the parties have agreed that information contained in such documents or answers may be disclosed, summarized, described or otherwise communicated or made available in whole or in part only to the following persons: (a) Defendant, attorneys for the Defendant, and regular employees of

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such attorneys assisting in the conduct of this action, and outside photocopying and document services companies, to use only for purposes of this litigation; (b) retained experts assisting counsel for Defendant in this action, and (c) used in discovery including depositions of witnesses and referenced in court filings to the extent it is relevant and necessary. To the extent the information has been obtained through other sources, this order shall not apply.

DONE and ORDERED this _____ day of November, 2009.

Linnea R. Johnson
United States Magistrate Judge

Courtesy copies:
The Honorable Kenneth A. Marra
Counsel of Record