

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**DEFENDANT JEFFREY EPSTEIN'S RESPONSE & OBJECTIONS TO
SECOND REQUEST FOR PRODUCTION, dated December 19, 2008**

Defendant, JEFFREY EPSTEIN, by and through his undersigned attorneys, serves his responses and objections to the Request to Produce, dated December 19, 2008 and states:

Request No. 1. All policies of insurance, including the declarations page and all binders, amendments, and endorsements, covering Defendant's residence at 358 El Brillo Way, Palm Beach, FL 33480.

Response: Objection, overly broad, not relevant and material and not calculated to lead to the discovery of admissible evidence. Plaintiff alleged claims occurred during a specific time period in 2004 – 2005, yet to be specifically identified. Yet, no time period whatsoever is set forth in the Request for Production. Additionally, Defendant objects in that the policies contain value and/or asset information which is not relevant, material nor calculated to lead to the discovery of admissible evidence at this point in time; said information is both private and confidential.

EXHIBIT "C"

1/26/09

Jane Doe No. 2 v. Epstein
Page 2

Certificate of Service

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S. Mail and facsimile to the following addressees this 26th day of January, 2009.

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Respectfully submitted,

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