

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

JANE DOE,

**CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON**

Plaintiff,

Vs.

JEFFREY EPSTEIN, et al.

Defendant.

/

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,  
08-80994, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092

/

**NOTICE OF SUPPLEMENTAL AUTHORITY ON PLAINTIFF JANE DOE'S MOTION  
FOR AN ORDER TO SHOW CAUSE AND FOR AN ORDER TO COMPEL AND  
INCORPORATED MEMORANDUM OF LAW [DE 483]**

Plaintiff, Jane Doe, hereby gives notice of filing portions of the probation file of Defendant, Jeffrey Epstein, in connection with the above referenced Motion for Order to Show Cause and to Compel the Deposition of Jean Luc Brunel [DE 483].

On March 10, 2010 Plaintiff filed her Motion for an Order to Show Cause and for an Order to Compel [DE 483] requesting entry of an Order directed to Jean Luc Brunel and his counsel ordering them to show cause why they should not be held in contempt, for sanctions, and for an Order compelling Jean Luc Brunel to appear for deposition.

Plaintiff's counsel recently obtained Epstein's probation file that contains documents that further corroborate Plaintiff's position that Brunel has not remained out

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

of the country as Brunel's counsel suggested, but has in fact been staying with Epstein much of 2010, if we are to believe the records Epstein provided to probation.

The portions of the probation file, specifically the Written Monthly Reports from December 2009 through February 2010 are attached hereto as Exhibit "A." A section of the Written Monthly Report requires Defendant to "List full names, ages, and your relationship to all persons who resided at your residence this month" in the middle section of the form.

Defendant identifies Jean Luc Brunel in his probation papers as residing with him within the period of December 2009 to February 2010, when Ms. Kudman represented him to be out of Florida.

As indicated in our previous pleading, Mr. Brunel was served for deposition, and his counsel Ms. Kudman represented that she would produce him for deposition in Florida.

She ultimately reneged, saying that her client told her that he was in France indefinitely and would not be returning to the United States, a representation known to be false.

In an email dated January 25, 2010, Ms. Kudman responds to a request for dates for her client's deposition by writing, "I have just been informed that my client will be out of the country until the end of March." (Email attached here to as Exhibit "B")

Again, while it is not believed that Ms. Kudman made the false representation intentionally, and it is more likely that Mr. Brunel simply made that false representation

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

to his attorney, it is impossible for the undersigned to know with any degree of certainty exactly who participated in this plan to obstruct Jane Doe's discovery.

As such, Plaintiff files her supplemental authority and requests the relief previously sought.

DATED: May 17, 2010

Respectfully Submitted,

s/ Bradley J. Edwards  
Bradley J. Edwards  
FARMER, JAFFE, WEISSING,  
EDWARDS, FISTOS & LEHRMAN, P.L.  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301  
Telephone (954) 524-2820  
Facsimile (954) 524-2822  
Florida Bar No.: 542075  
E-mail: brad@pathtojustice.com

*and*

Paul G. Cassell  
Pro Hac Vice  
332 S. 1400 E.  
Salt Lake City, UT 84112  
Telephone: 801-585-5202  
Facsimile: 801-585-6833  
E-Mail: cassellp@law.utah.edu

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 17, 2010 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically filed Notices of Electronic Filing.

s/ Bradley J. Edwards  
Bradley J. Edwards

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

**SERVICE LIST**

**Jane Doe v. Jeffrey Epstein  
United States District Court, Southern District of Florida**

Jack Alan Goldberger, Esq.  
Jgoldberger@agwpa.com

Robert D. Critton, Esq.  
rcritton@bclclaw.com

Isidro Manual Garcia  
isidrogarcia@bellsouth.net

Jack Patrick Hill  
iph@searcylaw.com

Katherine Warthen Ezell  
KEzell@podhurst.com

Michael James Pike  
MPike@bclclaw.com

Paul G. Cassell  
cassellp@law.utah.edu

Richard Horace Willits  
lawyerswillits@aol.com

Robert C. Josefsberg  
rjosefsberg@podhurst.com

Adam D. Horowitz  
ahorowitz@sexabuseattorney.com

Stuart S. Mermelstein  
ssm@sexabuseattorney.com