

EXHIBIT 5

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3 JANE DOE NO. 2, Case No: 08-CV-80119
4 Plaintiff,
5 Vs
6 JEFFREY EPSTEIN,
7 Defendant.

_____ /

8 JANE DOE NO. 3, Case NO: 08-CV-80232
9 Plaintiff,
10 Vs
11 JEFFREY EPSTEIN,
12 Defendant.

_____ /

13 JANE DOE NO. 4, Case No: 08-CV-80380
14 Plaintiff,
15 Vs.
16 JEFFREY EPSTEIN,

17 Defendant.

18 _____ /

19 JANE DOE NO. 5, Case No: 08-CV-80381
20 Plaintiff,
21 Vs
22 JEFFREY EPSTEIN,
23 Defendant.

24 _____ /
25

<p>1 JANE DOE NO. 6, Case No: 08-CV-80994 2 Plaintiff, 3 Vs 4 JEFFREY EPSTEIN, 5 Defendant. 6 _____/</p> <p>7 JANE DOE NO. 7, Case No. 08-CV-80993 8 Plaintiff, 9 Vs 10 JEFFREY EPSTEIN, 11 Defendant. 12 _____/ Case No: 08-CV-80811 13 Plaintiff, 14 Vs 15 JEFFREY EPSTEIN, 16 Defendant. 17 _____/</p> <p>18 JANE DOE, Case No: 08-CV-80893 19 Plaintiff, 20 Vs 21 JEFFREY EPSTEIN, 22 Defendant. 23 _____/</p> <p>24</p> <p>25</p>	<p>Page 2</p> <p>1 V I D E O T A P E D 2 D E P O S I T I O N 3 o f 4 A L F R E D O R O D R I G U E Z 5 6 taken on behalf of the Plaintiffs pursuant 7 to a Re-Notice of Taking Deposition (Duces Tecum) 8 9 - - - 10 APPEARANCES: 11 12 M E R M E L S T E I N & H O R O W I T Z , P . A . 13 B Y : S T U A R T M E R M E L S T E I N , E S Q . 14 18205 Biscayne Boulevard 15 Suite 2218 16 Miami, Florida 33160 17 Attorney for Jane Doe 2, 3, 4, 5, 18 6, and 7. 19 R O T H S T E I N R O S E N F E L D T A D L E R 20 B Y : B R A D J . E D W A R D S , E S Q . , a n d 21 C A R A H O L M E S , E S Q . 22 L a s O l a s C i t y C e n t r e 23 S u i t e 1 6 5 0 24 401 E a s t L a s O l a s B o u l e v a r d 25 F o r t L a u d e r d a l e , F l o r i d a 3 3 3 0 1 26 A t t o r n e y f o r J a n e D o e a n d E . W . 27 A n d L . M . 28 P O D H U R S T O R S E C K 29 B Y : K A T H E R I N E W . E Z E L L 30 25 W e s t F l a g l e r S t r e e t 31 S u i t e 8 0 0 32 M i a m i , F l o r i d a 3 3 1 3 0 33 A t t o r n e y f o r J a n e D o e 1 0 1 a n d 1 0 2 .</p>
<p>1 JANE DOE NO. 11, Case No: 08-CV-80469 2 Plaintiff, 3 Vs 4 JEFFREY EPSTEIN, 5 Defendant. 6 _____/</p> <p>7 JANE DOE NO. 101, Case No: 09-CV-80591 8 Plaintiff, 9 Vs 10 JEFFREY EPSTEIN, 11 Defendant. 12 _____/ Case No: 09-CV-80656 13 Plaintiff, 14 Vs 15 JEFFREY EPSTEIN, 16 Defendant. 17 _____/</p> <p>18</p> <p>19</p> <p>20 1031 Ives Dairy Road 21 Suite 228 22 North Miami, Florida 23 July 29, 2009 24 11:00 a.m. to 5:30 p.m.</p> <p>25</p>	<p>Page 3</p> <p>1 APPEARANCES: 2 3 L E O P O L D - K U V I N 4 A D A M J . L A N G I N O , E S Q . 5 2 9 2 5 P G A B o u l e v a r d 6 S u i t e 2 0 0 7 P a l m B e a c h G a r d e n s , F l o r i d a 3 3 4 1 0 8 A t t o r n e y f o r B . B .</p> <p>9 R I C H A R D W I L L I T S , E S Q . 10 2 2 9 0 1 0 t h A v e n u e N o r t h 11 S u i t e 4 0 4 12 L a k e W o r t h , F l o r i d a 3 3 4 6 1 13 A t t o r n e y f o r C . M . A .</p> <p>14 B U R M A N , C R I T T O N , L U T T I E R & 15 C O L E M A N , L L P 16 B Y : R O B E R T C R I T T O N , E S Q . 17 5 1 5 N o r t h F l a g l e r D r i v e 18 S u i t e 4 0 0 19 W e s t P a l m B e a c h , F l o r i d a 3 3 4 0 1 20 A t t o r n e y f o r J e f f r e y E p s t e i n .</p> <p>21 22 23 24 25</p> <p>26 ALSO PRESENT: 27 28 J O E L A N G S A M , V I D E O G R A P H E R 29 30 - - - 31 32 33 34 35</p>

2 (Pages 2 to 5)

		Page 6		Page 8
1	INDEX OF EXAMINATION		1	Doe right here on the copy you gave me. I'm
2			2	missing which Jane Doe this is.
3	WITNESS	DIRECT	3	They're all different case numbers. Do
4		CROSS	4	you want me to go through each case number?
5	ALFREDO RODRIGUEZ		5	MR. CRITTON: I'm going to note my
6	(By Mr. Mermelstein) 12		6	objection. Obviously if this deposition
7	(By Mr. Edwards) 157		7	gets played -- not obviously, I'm going to
8	(By Mr. Langino) 260		8	object to the litany of each one so I don't
9			9	know how we can separate it out. Maybe if
10	INDEX OF EXHIBITS		10	and when at the time of trial and depending
11	EXHIBITS	PAGE	11	on how the Court determines what comes in
12	1 Message pad	72	12	and what doesn't with regard to the
13	2 Documents	115	13	consolidated aspects of this. I have no
14			14	great idea other than just saying Jane Doe
15			15	versus Epstein, et al, or something like
16			16	that, or Jane Doe, et al.
17			17	MS. EZELL: Couldn't we just say and
18			18	those cases which have been consolidated
19			19	with it for Discovery purposes?
20			20	MR. EDWARDS: Although there is cases
21			21	here that have cross noticed this from state
22			22	court that haven't been consolidated so that
23			23	may not work. You may have to read them
24			24	all, if it works out your way that will just
25			25	get edited out, at least he will have read
		Page 7		Page 9
1	Deposition taken before MICHELLE PAYNE, Court		1	that caption, every caption. Right? Is
2	Reporter and Notary Public in and for the State of		2	there a better suggestion?
3	Florida at Large, in the above cause.		3	MR. CRITTON: No. There may be a better
4	- - -		4	suggestion if he starts this is such and
5	THE VIDEOGRAPHER: This is the case of		5	such day, it's the deposition of Mr.
6	Jane Doe No. 2, plaintiff, versus Jeffrey		6	Rodriguez in the case such and such, and we
7	Epstein, defendant. Jane Doe No. 3,		7	can almost fill it in depending on which
8	plaintiff, versus Jeffrey Epstein,		8	tape it goes, how it fills in, at least
9	defendant. Jane Doe No. 4, plaintiff,		9	we'll have the context of the first and
10	versus Jeffrey Epstein, defendant. And Jane		10	depending on whether the Judge reads it in
11	Doe No. 5, plaintiff, versus Jeffrey		11	from a consolidated or they all come
12	Epstein, defendant. Jane Doe No. 6,		12	related, I have no great idea.
13	plaintiff, versus Jeffrey Epstein,		13	MR. EDWARDS: I was thinking if he read
14	defendant. Jane Doe No. 7, plaintiff,		14	every one of them and it was the seventh in
15	versus Jeffrey Epstein, defendant. CMA,		15	line then you just would edit it so you
16	plaintiff, versus Jeffrey Epstein,		16	would only read that one.
17	defendant. And Jane Doe, plaintiff, versus		17	MR. CRITTON: I'm okay with that too.
18	Jeffrey Epstein, et al, defendant. And Jane		18	THE VIDEOGRAPHER: On page number three
19	Doe -- is there a shorter thing that we can		19	there is something missing on the top here.
20	do here? It's also missing this one right		20	Do you want me to read each case number
21	here.		21	separately?
22	MR. MERMELSTEIN: Do we have a problem		22	MR. MERMELSTEIN: I don't think it's
23	with saying Jane Doe 2 and the Epstein and		23	necessary.
24	related cases?		24	MR. EDWARDS: I don't think it's
25	THE VIDEOGRAPHER: I'm missing this Jane		25	necessary either.

3 (Pages 6 to 9)

<p>1 Q. Was there a Michael Liffman that was 2 hired as a butler at some point? 3 A. That was before me. 4 Q. Okay. Who was the household manager 5 before you? 6 A. I understand there were several in one 7 year. There was Mike Friedman, there is Joe 8 Alessi. There was a couple of Filipino girls -- 9 no, they were from Bangladesh. I can't remember. 10 I used to send his -- I used to forward his mail 11 to Maryland but I can't recall right now, sir. 12 Q. Okay. And at the time you took the job 13 it was open, he didn't have anyone in that 14 position. Is that correct? 15 A. What I find is the staff from his house 16 in Manhattan they gave me the briefing on what he 17 likes and what he doesn't like. Belinda Retta 18 from Mrs. Maxwell, they were due to give me an 19 inside look because it was too much to learn in 20 48 hours so they were there handling the house 21 before me, so there were two couples. 22 Q. Two couples. All right. Let's walk 23 through that. So the first day you come to work 24 you're basically you received some training? 25 A. Exactly.</p>	<p>Page 22</p> <p>1 garlic, maybe something like that, you know, 2 personal things. 3 Q. You mentioned Ms. Maxwell? 4 A. Yes. 5 Q. Who is she? 6 A. She was her companion. 7 Q. Whose companion? 8 A. Mr. Epstein. 9 Q. By companion what do you mean? 10 A. Well, in the beginning I assume they were 11 husband and wife but, you know, they were not 12 married, but I treated her as such. Mrs. Maxwell 13 was like the lady of the house. 14 Q. Okay. So it was your understanding they 15 were in a romantic relationship? 16 MR. CRITTON: Form. 17 THE WITNESS: Something like that. 18 BY MR. MERMELSTEIN: 19 Q. But they just weren't married? 20 A. No, sir. 21 Q. So you took instructions from Ms. Maxwell 22 as well as Mr. Epstein? 23 A. She gave me the instructions of how to 24 run the household directly. In other words, she 25 likes the towels, the sheets and all that so I</p>
<p>Page 23</p> <p>1 Q. And tell us who provided that training? 2 A. Joe-Joe is his nickname but he runs Mr. 3 Epstein's estate in Manhattan as well as his wife. 4 They were very nice people telling me because you 5 have to understand, there is a lot of specifics, 6 where to park the car, here and there, if the 7 plane lands here you have to park the Mercedes, 8 you know, very specific details, and he gave me an 9 inside of all of that. 10 Q. Okay. So you would pick up Mr. Epstein 11 at the airport? 12 A. Yes. 13 Q. And how long did this training last? 14 A. Two or three days. 15 Q. Okay. And it was Joe-Joe and his wife? 16 A. Joe-Joe, yes. 17 Q. You don't remember the last name or full 18 names? 19 A. No, sir. 20 Q. Anything else you can remember that you 21 were told specifically regarding his preferences? 22 A. He likes Columbian coffee, that's the 23 only type of coffee he drinks, and it was shipped 24 from New York from Balducci's, stuff like that. 25 Where to buy the groceries. And he's allergic to</p>	<p>Page 25</p> <p>1 give the instructions to Louella how to proceed 2 with the cleaning and the upkeep of the house. 3 Q. You went through the employees who worked 4 under you as household manager. Who would you say 5 was your direct supervisor, was it both 6 Ms. Maxwell and Mr. Epstein? 7 A. Mrs. Maxwell. 8 Q. Was your supervisor? 9 A. Yes, sir. 10 Q. I think I interrupted you. You were 11 going through the daily routine, and I'm not sure 12 you had completed going through what you would do 13 in a day. 14 A. Until noon we have all the -- we knew 15 that the food that was going to be served for 16 lunch and dinner. And then in the afternoon it 17 was open to shopping, maybe have to drive him to 18 the airport to pick up somebody, or answering the 19 phones. 20 Q. Was there a procedure or protocol for 21 answering the phones? 22 A. Yes, there was. 23 Q. And what was that? 24 A. I couldn't relay the message directly to 25 Mr. Epstein but take message on a piece of paper</p>

<p>1 JANE DOE NO. 6, CASE NO: 08-CV-80994 2 Plaintiff, 3 Vs. 4 JEFFREY EPSTEIN, 5 Defendant. 6 _____/</p> <p>7 JANE DOE NO. 7, CASE NO: 08-CV-80993 8 Plaintiff, 9 Vs. 10 JEFFREY EPSTEIN, 11 Defendant. 12 _____/</p> <p>13 C.M.A., CASE NO: 08-CV-80811 14 Plaintiff, 15 Vs. 16 JEFFREY EPSTEIN, 17 Defendant. 18 _____/</p> <p>19 JANE DOE, CASE NO: 08-CV-80893 20 Plaintiff, 21 Vs. 22 JEFFREY EPSTEIN, 23 Defendant. 24 _____/</p> <p>25</p>	Page 271	Page 273
<p>1 JANE DOE NO. II, CASE NO: 08-CV-80469 2 Plaintiff, 3 Vs. 4 JEFFREY EPSTEIN, 5 Defendant. 6 _____/</p> <p>7 JANE DOE NO. 101 CASE NO: 08-CV-80591 8 Plaintiff, 9 Vs. 10 JEFFREY EPSTEIN, 11 Defendant. 12 _____/</p> <p>13 JANE DOE NO. 102, CASE NO: 08-CV-80656 14 Plaintiff, 15 Vs. 16 JEFFREY EPSTEIN, 17 Defendant. 18 _____/</p> <p>19 20 21 22 23 24 25</p>	Page 272	Page 274

2 (Pages 271 to 274)

<p>1 APPEARANCES:</p> <p>2 RICHARD WILLITS, ESQ. 2290 10th Avenue North Suite 404 Lake Worth, Florida 33461 Attorney for C.M.A. Appeared via telephone.</p> <p>3 BURMAN, CRITTON, LUTTIER & COLEMAN, LLP BY: ROBERT CRITTON, ESQ. 515 North Flagler Drive Suite 400 West Palm Beach, Florida 33401 Attorney for Jeffrey Epstein.</p> <p>4 ALSO PRESENT:</p> <p>5 JOE LANGSAM, VIDEOGRAPHER</p> <p>6 - - -</p>	Page 275	Page 277 <p>1 Deposition taken before MICHELLE PAYNE, Court 2 Reporter and Notary Public in and for the State of 3 Florida at Large, in the above cause. 4 - - - 5 THE VIDEOGRAPHER: This is a continuation 6 of the deposition of Alfredo Rodriguez. 7 Today is Friday, August the 7th, the year 8 2009, starting time approximately 1:15 p.m. 9 Will the court reporter please swear in 10 the witness? 11 Thereupon, 12 ALFREDO RODRIGUEZ, 13 having been first duly sworn or affirmed, was 14 examined and testified as follows: 15 MR. CRITTON: Before we get started just 16 with regard to Ms. Ezell represents Jane Doe 17 101 and 102, the alleged time of her 18 incidents as of least have been plead in the 19 complaint for 101 is '99 -- I'm sorry, '98 20 through 2002, with Jane Doe 102 the Spring 21 of -- Spring/Summer of 2003. Mr. Rodriguez 22 never even began employment until '04 and 23 '05. I think her questioning I think -- I 24 can't say she doesn't have standing based on 25 the court order, but I would say it's</p>
<p>1 CONTINUED INDEX OF EXAMINATION</p> <p>2 WITNESS DIRECT CROSS REDIRECT RECROSS</p> <p>3 ALFREDO RODRIGUEZ</p> <p>4 (By Ms. Ezell) 278 441, 467</p> <p>5 (By Mr. Willits) 334 453, 469</p> <p>6 (By Mr. Critton) 338 464</p> <p>7 (By Mr. Edwards) 419, 454, 468</p> <p>8 (By Mr. Langino) 452</p> <p>9</p> <p>10</p> <p>11</p> <p>12 CONTINUED INDEX OF EXHIBITS</p> <p>13 PLAINTIFF'S PAGE</p> <p>14 3 Drawing 315</p> <p>15 4 Photograph 327</p> <p>16 5 Photograph 331</p> <p>17 6 Photograph 331</p> <p>18 7 Photograph 331</p> <p>19 8 Photograph 331</p> <p>20 9 Report 446</p> <p>21 (Exhibits 4, 5, 6, 7, and 8 were retained by Ms. Ezell.)</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	Page 276	Page 278 <p>1 completely irrelevant and immaterial and has 2 no probative value with regard to this 3 particular witness based upon the two 4 clients at least that are in suit at this 5 point in time. 6 MS. EZELL: As Mr. Critton well knows I 7 represent a number of other clients whose 8 cases have not been filed and I believe we 9 do have standing to ask questions, and I do 10 intend to do that today. 11 EXAMINATION 12 BY MS. EZELL: 13 Q. Mr. Rodriguez, you stated last time that 14 there were guests at the house, frequent guests, 15 friends from Harvard. 16 Do you remember that testimony? 17 A. Yes, ma'am. 18 Q. And was there a lawyer from Harvard named 19 Alan Dershowitz? 20 A. Yes, ma'am. 21 Q. And are you familiar with the fact that 22 he's a famous author and famous lawyer? 23 A. Yes, ma'am. 24 Q. How often during the six months or so 25 that you were there was Mr. Dershowitz there?</p>

3 (Pages 275 to 278)

	Page 311		Page 313
1	MR. CRITTON: Form.	1	shower, I don't know whether he ever used
2	THE WITNESS: Yes, ma'am.	2	plural.
3	BY MS. EZELL:	3	BY MS. EZELL:
4	Q. And were there some who maybe came just	4	Q. Was there more than one picture of a girl
5	once or twice with other young women?	5	in the shower?
6	A. That's correct, ma'am.	6	A. There were two girls in the shower.
7	Q. Now, where would the young woman who was	7	Q. Two girls in the shower together?
8	bringing another young woman go during the time	8	A. Yes, ma'am.
9	the person that she brought was upstairs giving	9	Q. And were those two girls engaged in
10	the massage?	10	something sexual?
11	MR. CRITTON: Form.	11	A. Yes, ma'am.
12	THE WITNESS: I will take them to the	12	Q. And I may have asked you this question,
13	kitchen and Sarah would take them from	13	forgive me if I did, did you know those two girls?
14	there.	14	A. No, ma'am.
15	BY MS. EZELL:	15	Q. Did Ms. Maxwell have nude pictures of
16	Q. Do you know where she took them?	16	Nadia on her computer?
17	A. No, ma'am.	17	MR. CRITTON: Form.
18	Q. Were they ever taken to just sit in the	18	THE WITNESS: I don't know, ma'am.
19	living room and wait?	19	BY MS. EZELL:
20	MR. CRITTON: Form.	20	Q. Did you ever meet a young woman named
21	THE WITNESS: I don't know, ma'am.	21	Emmy who had an association with Ms. Maxwell?
22	BY MS. EZELL:	22	MR. CRITTON: Emmy?
23	Q. These pictures of nude young women taken	23	MS. EZELL: Emmy.
24	in gatherings where they were smiling, did they	24	THE WITNESS: I don't remember, ma'am.
25	appear to you to be taking part in an orgy?	25	BY MS. EZELL:

	Page 312		Page 314
1	MR. CRITTON: Form.	1	Q. Did you ever have any conversations with
2	THE WITNESS: I don't know, ma'am.	2	Ms. Maxwell about any of the women in those
3	BY MS. EZELL:	3	pictures?
4	Q. Do you know the word cavorting?	4	A. No, ma'am.
5	A. No, ma'am, I don't know.	5	Q. And did you ever have a conversation with
6	Q. I need my Thesaurus. You said they were	6	Sarah Kellen about any of the pictures of the
7	smiling, did they appear to be having a good time?	7	girls in her computer?
8	A. Yes, ma'am.	8	A. No, ma'am.
9	Q. Did they appear to be doing anything	9	Q. You were asked last time about the creams
10	sexual?	10	and lotions that Mr. Epstein typically had
11	A. Yes, ma'am.	11	available to him and you said you thought there
12	Q. And in these instances were there girls	12	was a favorite one but you couldn't remember it.
13	doing sexual things with other girls?	13	A. Spa.
14	A. Yes, ma'am.	14	Q. Spa, you did say Spa.
15	Q. And I'm still talking about the pictures	15	A. Yeah.
16	on Ms. Maxwell's computer.	16	Q. Thank you.
17	A. Yes, ma'am.	17	Where did the stairway from the kitchen
18	MR. CRITTON: You're talking about the	18	lead -- to where did it lead?
19	group shots that he's mentioned from Russia	19	A. To the second floor between the first and
20	and Eastern Europe?	20	second bedrooms.
21	MS. EZELL: And girls in the shower.	21	Q. Were either of those bedrooms the master
22	MR. CRITTON: Let me object to the form	22	bedroom?
23	then the way you just now described that.	23	A. No, ma'am.
24	MS. EZELL: He said for instance.	24	Q. Could one go up that staircase through --
25	MR. CRITTON: He had said a girl in the	25	could one go up that staircase and reach the