

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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

DEFENDANT'S NOTICE OF INDEPENDENT MEDICAL EXAMINATION OF
PLAINTIFF, JANE DOE # 4 (80380)

Defendant, JEFFREY E. EPSTEIN, pursuant to Rule 35, Fed. R. Civ. P., notices the Plaintiff for an independent/psychological medical examination and states:

1. An appointment for examination of the Plaintiff has been made with Ryan Hall, M.D. of C.W. Hall, M.D., P.A. at 9:00 a.m. on October 14, 2009 at the law firm of Burman, Critton, Luttier and Coleman, LLP, located at 303 Banyan Boulevard, Ste. 400, West Palm Beach, FL, 33401. The Plaintiff is to wear comfortable clothing and bring a sweater. The examination shall consist of an interview and testing and will likely last until 5:30 p.m. See infra and Motion attached at DE (303) for scope, time and place of IME. See Exhibits attached as well.

2. Plaintiff has not provided an available date; however, unless a timely and valid objection to this Notice is made, the Plaintiff is required by this Rule to be in attendance at the above-scheduled examination.

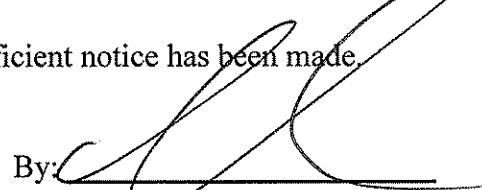
3. Pursuant to Rule 35, if the psychiatrist performing the examination is called as a witness, the psychiatrist shall not be identified as one appointed by the Court.

4. The cost of the examination will be originally borne by the Defendant but is subject to taxation by the Court upon proper motion.

5. The interview will be videotaped.

6. Dr. Halls' specialties and qualifications are attached to the Motion to Compel the IME at DE (303). The time, place, manner, conditions and scope of the examination are attached to the Motion to Compel the IME at DE (303).

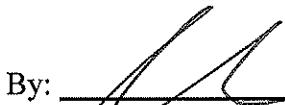
See Affidavit attached thereto. All of the above documents have been provided to the Plaintiff's counsel and, therefore, sufficient notice has been made.

By: 
MICHAEL J. PIKE, ESQ.
Florida Bar #617296

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 16 day of September, 2009

Respectfully submitted,

By: 
ROBERT D. CRITTON, JR., ESQ.
Florida Bar No. 224162
rcrit@bclclaw.com

MICHAEL J. PIKE, ESQ.
Florida Bar #617296
mpike@bclclaw.com
BURMAN, CRITTON, LUTTIER &
COLEMAN
515 N. Flagler Drive, Suite 400
West Palm Beach, FL 33401
561/842-2820 Phone
561/515-3148 Fax
(*Counsel for Defendant Jeffrey Epstein*)

Certificate of Service
Jane Doe No. 2 v. Jeffrey Epstein
Case No. 08-CV-80119-MARRA/JOHNSON

Stuart S. Mermelstein, Esq.
Adam D. Horowitz, Esq.
Mermelstein & Horowitz, P.A.
18205 Biscayne Boulevard
Suite 2218
Miami, FL 33160
305-931-2200
Fax: 305-931-0877
ssm@sexabuseattorney.com
ahorowitz@sexabuseattorney.com

Counsel for Plaintiffs
*In related Cases Nos. 08-80069, 08-80119,
08-80232, 08-80380, 08-80381, 08-80993,
08-80994*

Richard Horace Willits, Esq.
Richard H. Willits, P.A.
2290 10th Avenue North
Suite 404
Lake Worth, FL 33461
561-582-7600
Fax: 561-588-8819
*Counsel for Plaintiff in Related Case No.
08-80811*
reelrhw@hotmail.com

Jack Scarola, Esq.
Jack P. Hill, Esq.

Brad Edwards, Esq.
Rothstein Rosenfeldt Adler
401 East Las Olas Boulevard
Suite 1650
Fort Lauderdale, FL 33301
Phone: 954-522-3456
Fax: 954-527-8663
bedwards@rra-law.com
*Counsel for Plaintiff in Related Case No.
08-80893*

Paul G. Cassell, Esq.
Pro Hac Vice
332 South 1400 E, Room 101
Salt Lake City, UT 84112
801-585-5202
801-585-6833 Fax
cassellp@law.utah.edu
Co-counsel for Plaintiff Jane Doe

Isidro M. Garcia, Esq.
Garcia Law Firm, P.A.
224 Datura Street, Suite 900
West Palm Beach, FL 33401
561-832-7732
561-832-7137 F
isidrogarcia@bellsouth.net
Counsel for Plaintiff in Related Case No.

Searcy Denney Scarola Barnhart & Shipley, 08-80469

P.A.

2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409

561-686-6300

Fax: 561-383-9424

jsx@searcylaw.com

jph@searcylaw.com

Counsel for Plaintiff, C.M.A.

Robert C. Josefsberg, Esq.

Katherine W. Ezell, Esq.

Podhurst Orseck, P.A.

25 West Flagler Street, Suite 800

Miami, FL 33130

305 358-2800

Fax: 305 358-2382

rjosefsberg@podhurst.com

kezell@podhurst.com

Counsel for Plaintiffs in Related Cases

Nos. 09-80591 and 09-80656

Bruce Reinhart, Esq.

Bruce E. Reinhart, P.A.

250 S. Australian Avenue

Suite 1400

West Palm Beach, FL 33401

561-202-6360

Fax: 561-828-0983

ecf@brucereinhartlaw.com

Counsel for Defendant Sarah Kellen

Jack Alan Goldberger, Esq.

Atterbury Goldberger & Weiss, P.A.

250 Australian Avenue South

Suite 1400

West Palm Beach, FL 33401-5012

561-659-8300

Fax: 561-835-8691

jagesq@bellsouth.net

Counsel for Defendant Jeffrey Epstein

Theodore J. Leopold, Esq.

Spencer T. Kuvin, Esq.

Leopold, Kuvin, P.A.

2925 PGA Blvd., Suite 200

Palm Beach Gardens, FL 33410

561-684-6500

Fax: 561-515-2610

Counsel for Plaintiff in Related Case No.

08-08804