

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

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

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.

/

JANE DOE NO. 3,

CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.

/

CASE NO.: 08-CV-80380-MARRA/JOHNSON

JANE DOE NO. 4,

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.

/

**CASE NO.: 08-CV-80381-MARRA/JOHNSON**

JANE DOE NO. 5,

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

---

**CASE NO.: 08-80994-CIV-**  
**MARRA/JOHNSON**

JANE DOE NO. 6,

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

---

**CASE NO.: 08-80993-CIV-**  
**MARRA/JOHNSON**

JANE DOE NO. 7,

Plaintiff,

JEFFREY EPSTEIN

Defendant.

---

**CASE NO.: 08-80811-CIV-**  
**MARRA/JOHNSON**

Plaintiff,

JEFFREY EPSTEIN

Defendant.

---

JANE DOE,

CASE NO.: 08-80893-CIV-  
MARRA/JOHNSON

Plaintiff,

JEFFREY EPSTEIN et al,

Defendants.

---

DOE II,

CASE NO.: 09-80469-CIV-MARRA-  
JOHNSON

Plaintiff,

JEFFREY EPSTEIN et al,

Defendants.

---

JANE DOE NO. 101,

CASE NO.: 09-80591-CIV-MARRA-  
JOHNSON

Plaintiff,

JEFFREY EPSTEIN

Defendant.

---

JANE DOE NO. 102,

CASE NO.: 09-80656-CIV-MARRA/  
JOHNSON

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

**DEFENDANT, JEFFREY EPSTEIN'S NOTICE OF SUPPLEMENTAL AUTHORITY IN CONNECTION WITH THE VARIOUS MOTIONS TO COMPEL DISCOVERY AND REPLIES THERETO SPECIFICALLY RELATED TO THE DISCOVERABILITY OF PLAINTIFFS' PAST SEXUAL HISTORY**

Defendant, JEFFREY EPSTEIN, (hereinafter "EPSTEIN") by and through his undersigned attorneys, hereby files his Notice of Supplemental Authority In Connection With The Various Motions To Compel Discovery And Replies Filed By Epstein Specifically Related To The Discoverability Of Plaintiffs' Past Sexual History:

1. A hearing was recently held in a related state court proceeding in connection with the above discovery requests: Case No.: 502008CA028058, *E.W. v. Epstein*. The Trial Court ruled that the past sexual history of the Plaintiff was discoverable. The transcript is attached hereto as Supplemental Authority in connection with the Several Motions to Compel and Replies associated with the same discovery requests pending before this Federal Court concerning the Plaintiffs' past sexual history. See Composite Exhibit "A" with attached discovery response number 19.

2. Two additional related state court matters were held in connection with the same discovery requests, and similar rulings were made. See Composite Exhibit "B" (the Orders and related discovery response number 18 in Case No.: 502008CA025129XXXXMBAI, *A.C. v. Epstein*) and Composite Exhibit "C" (the Transcript (see pages 20-21) and with attached discovery request number 19 in Case No.: 502008CA020614XXXXMBAI, *Jane Doe II v. Epstein et al*)

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 28 day of May, 2009

Respectfully submitted,

By:   
ROBERT D. CRITTON, JR., ESQ.  
Florida Bar No. 224162  
[rcrit@bclclaw.com](mailto:rcrit@bclclaw.com)  
MICHAEL J. PIKE, ESQ.  
Florida Bar #617296  
[mpike@bclclaw.com](mailto: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](mailto:ssm@sexabuseattorney.com)  
[ahorowitz@sexabuseattorney.com](mailto:ahorowitz@sexabuseattorney.com)  
*Counsel for Plaintiffs*  
*In related Cases Nos. 08-80069, 08-80119, 08-80232, 08-80380, 08-80381, 08-80993, 08-80994*

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](mailto:bedwards@rra-law.com)  
*Counsel for Plaintiff in Related Case No. 08-80893*  
Paul G. Cassell, Esq.  
*Pro Hac Vice*

Richard Horace Willits, Esq.  
Richard H. Willits, P.A.  
2290 10<sup>th</sup> 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

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*

Jack Scarola, Esq.  
Jack P. Hill, Esq.  
Searcy Denney Scarola Barnhart &  
Shipley, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, FL 33409  
561-686-6300  
Fax: 561-383-9424  
jx@searcylaw.com  
jph@searcylaw.com  
*Counsel for Plaintiff, C.M.A.*

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. 08-80469**

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*

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**

Theodore J. Leopold, Esq.  
Spencer T. Kuvin, Esq.  
Ricci-Leopold, 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**  
skuvin@riccilaw.com

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*