

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.

C.M.A.,

**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.: 502008CA025129XXXXMBAL, A.C. v. Epstein) and **Composite Exhibit "C"** (the Transcript (see pages 20-21) and with attached discovery request number 19 in Case No.: 502008CA020614XXXXMBAL, 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

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

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

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.
Searcy Denney Scarola Barnhart &
Shipley, 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.

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@brucereinhardt.com
Counsel for Defendant Sarah Kellen

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

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. 08-80469*

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*

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