

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

CA FLORIDA HOLDINGS, LLC,
Publisher of *THE PALM BEACH POST*,
Plaintiff,

v.

DAVE ARONBERG, as State Attorney of
Palm Beach County, Florida; SHARON R.
BOCK, as Clerk and Comptroller of Palm
Beach County, Florida,

Defendants.

CASE NO.: 50-2019-CA-014681-XXXX-MB
DIVISION: AG

**PLAINTIFF'S MOTION TO DIRECT THE CLERK OF THE COURT TO UNSEAL THE
JEFFREY EPSTEIN GRAND JURY FILES FOR AN INVENTORY AND FOR AN
INVENTORY REPORT**

Plaintiff, CA HOLDINGS, LLC ("The *Palm Beach Post*") moves for an Order Directing the Clerk of the Court to Unseal the Jeffrey Epstein Grand Jury Files to create an inventory and provide the Court and *The Palm Beach Post* with the inventory and states:

1. *The Palm Beach Post* is a daily community newspaper published by Plaintiff CA Florida Holdings, LLC, with offices located at 2751 S. Dixie Highway, West Palm Beach, Florida.
2. Defendant Sharon R. Bock ("Clerk") is the duly elected Clerk and Comptroller of Palm Beach County, Florida. She is sued in her official capacity as her office is in possession of Grand Jury documents that are the subject of this action.
3. On October 21, 2020, *The Palm Beach Post* dropped State Attorney Dave Aronberg from the case pursuant to Fla. R. Civ. P. 1.250(b).

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4. By this action, *The Palm Beach Post* seeks access to the grand jury materials related to the State of Florida's prosecution of the late Jeffrey Epstein to determine why Epstein received a lenient criminal charge and a minimal work release sentence, where there was significant evidence that Epstein was and remained a serial sexual abuser of underage girls.

5. *The Palm Beach Post* alleges that the First Amendment to the United States Constitution, when read in conjunction with Fla. Stat. section 925.07, and under the facts of this case, compel the lowering of the cloak of grand jury secrecy to resolve the many unanswered questions surrounding Epstein's under and unprosecuted crimes and to inform the public whether justice was served.

6. Based upon discovery responses provided by the Clerk, and conversations between the Clerk's office and *The Palm Beach Post*, the Epstein Grand Jury files are being held by the Clerk in a sealed container. Further, the Clerk has not performed and does not possess an inventory of the Epstein Grand Jury materials and cannot state what materials are in its possession.

7. *The Palm Beach Post* requests that the Clerk be permitted to unseal the Epstein Grand Jury files, and that the Clerk be directed to create a written inventory of the items in its possession.

8. Also, *The Palm Beach Post* seeks an order that permits the Clerk to provide its inventory to *The Palm Beach Post* and to the Court.

9. The purpose of this inventory is to understand what is contained in the Clerk's files so that *The Palm Beach Post* will be able to more precisely advocate for the future release of specific Epstein Grand Jury materials.

10. It is understood that the Clerk does not oppose this Motion.

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11. To protect the privacy of victims and witnesses, *The Palm Beach Post* accepts that their names and other identifying information should be redacted in the inventory. It reserves the right to seek the release of such information at a later date.

WHEREFORE, *The Palm Beach Post* requests that its Motion be granted and that the Clerk be permitted to unseal the Epstein Grand Jury files, the Clerk be directed to create an inventory of the Epstein Grant Jury materials, with redactions for identifying information, the Clerk provide a copy of the inventory report to *The Palm Beach Post* and to the Court, and that the Court grant such other and further relief it deems just and proper.

Respectfully submitted,

GREENBERG TRAURIG, P.A.

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of The Palm Beach Post*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of October, 2020, a true and correct copy of the foregoing has been filed with the Clerk of the Court using the State of Florida e-filing system, which will send a notice of electronic service for all parties of record herein

/s/ Stephen A. Mendelsohn
STEPHEN A. MENDELSON