

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.

REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff, CA FLORIDA HOLDINGS, LLC, Publisher of THE PALM BEACH POST, by and through their undersigned counsel, hereby requests that Defendant, SHARON R. BOCK, as Clerk and Comptroller of Palm Beach County, Florida, produce all materials requested herein at the offices of the undersigned counsel within thirty (30) days from the date hereof, or such shorter time as may be ordered by the Court, pursuant to Rule 1.350, *Fla. R. Civ. P.*

DEFINITIONS AND INSTRUCTIONS

1. "Epstein Grand Jury Materials" shall refer to all evidence, testimony, documents, transcripts, notes, bills and other items used in or presented to the grand jury in and for Palm Beach County, Florida in the prosecution of Jeffrey E. Epstein, date of birth January 20, 1953, Palm Beach Circuit Court Case No. 50-2008-CF-AXXX-MB.
2. "Clerk" shall refer to the Office of the Clerk and Comptroller of Palm Beach County, Florida established by the Fla. Constitution, Article V, Section 16.

3. "State Attorney" shall refer to the Office of State Attorney for Palm Beach County, Florida established by Fla. Constitution, Article V, Section 17.

DOCUMENTS REQUESTED

1. Copies of all logs, notations, registers, lists and entries that show the delivery of Epstein Grand Jury Materials from the Clerk to the State Attorney. The specific materials delivered need not be disclosed or produced.
2. Copies of all logs, notations, registers, lists and entries that show the return of Epstein Grand Jury Materials by the State Attorney to the Clerk. The specific materials returned need not be disclosed or produced.
3. Copies of all communications between the Clerk and the State Attorney concerning the storage, possession, delivery, receipt and control of Epstein Grand Jury Materials. The specific materials referenced need not be disclosed or produced.
4. Copies of all logs, notations, registers, lists and entries that show the general types of Epstein Grand Jury Materials in the possession of the Clerk, without revealing their contents.
5. Copies of all logs, notations, registers, lists and entries that show the delivery of Epstein Grand Jury Materials to the Federal Bureau of Investigation. The specific materials referenced need not be disclosed or produced.
6. Copies of all logs, notations, registers, lists and entries that show the delivery of Epstein Grand Jury Materials to the United States Department of Justice and/or any Office of the United States Attorney. The specific materials referenced need not be disclosed or produced.

7. Copies of all subpoenas and any judicial process served upon the Clerk for production of Epstein Grand Jury Materials.
8. Copies of all communications between the Clerk and the United States Department of Justice, or the Federal Bureau of Investigation or any Offices of the United States Attorney concerning Epstein Grand Jury Materials. The specific materials referenced need not be disclosed or produced.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of July 2020, a copy of the foregoing has been electronically filed with the Florida E-File Portal for e-service on all parties of record herein.

Respectfully submitted,

GREENBERG TRAURIG, P.A.
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Plaintiff's Request for Production of Documents

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