

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 3,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**PLAINTIFF JANE DOE 3'S ANSWERS TO DEFENDANT'S FIRST
INTERROGATORIES**

Plaintiff, JANE DOE 3, by and through their undersigned counsel, and pursuant to Federal Rules of Civil Procedure Rule 33, hereby responds to Defendant, JEFFREY EPSTEIN'S First Set of Interrogatories to Plaintiff as follows:

General Objections

1. Plaintiff objects to Defendant's Interrogatories to the extent that the Interrogatories call for the disclosure of information protected by the attorney-client privilege, attorney work-product doctrine, or other applicable privilege or immunity, whether created by statute or common law. Plaintiff claims such privileges and protections to the extent implicated by each Interrogatory, and excludes privileged and protected information from any responses to Defendant's discovery. Any disclosure is inadvertent and is not intended to waive those privileges or protections, which are specifically reserved.

2. Plaintiff objects to Defendant's Interrogatories to the extent that same are vague, ambiguous, incomprehensible and/or overly broad.

EXHIBIT "A"

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your current age. Describe the lewd or lascivious exhibition, the date and whether you received money or other consideration from the person

Answer:

Plaintiff objects to this interrogatory as vague, overly broad, unduly burdensome, harassing, and not reasonably calculated to lead to discovery of admissible evidence. Moreover, this interrogatory is outrageous, offensive and apparently posed for the purpose of intimidating the victim. Fed.R.Evid. 412 makes any answer to this interrogatory inadmissible, and nothing in the answer could plausibly lead to discovery of admissible evidence.

22. List in detail all discussions/interviews which you had with any representative from FBI, U.S. Attorneys' Office, State Attorneys' Office (Palm Beach County), Palm Beach Sheriff's Office and Palm Beach Police Department regarding your meetings with Mr. Epstein. Include dates, who was present, the details of what was discussed, whether a court reporter was present and whether a taped statement was taken or whether you provided a written statement.

Answer:

Plaintiff met with the Palm Beach Police Department in 2007. She believes that she provided them with a written statement, and that they also tape recorded her interview.

Plaintiff also spoke with FBI agents in 2007 investigating the case on 2-3 occasions, including one meeting in person. Plaintiff does not believe that the statement was recorded.

23. State the names, addresses, ages and phone numbers of all females whom you claim were brought by you to Mr. Epstein's home to give him a massage. As to each female, state the amount of money you claim you were paid to bring each female.

Answer:

[REDACTED] (Jane Doe 4)
Plaintiff was not paid by the Defendant of bringing [REDACTED] (Jane Doe 4)

[REDACTED] (Jane Doe 2)
Plaintiff was paid \$100 for bringing [REDACTED] (Jane Doe 2)

[REDACTED]

VERIFICATION

Jane Doe 3 being duly sworn, deposes and says that the foregoing answers to interrogatories are true and correct to the best of her knowledge, information and belief.

Jane Doe 3

STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

SWORN TO AND SUBSCRIBED before me this 19 day of January, 2009 by Jane Doe 3, who is personally known to me or has produced the following identification 1 Rivers license which is current or has been issued within the past five years and bears a serial or other identifying number.

Elizabeth Gutierrez
Print Name

Elizabeth Gutierrez
Signature

NOTARY PUBLIC - STATE OF FLORIDA
Commission Number:
My commission expires:
(Notarial Seal)

