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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 4,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES

Plaintiff, JANE DOE 4, 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.

"A"

cc: JEN & DI

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Answer:

See Plaintiff's Answer to Interrogatory No. 5.

7. Were you suffering from physical infirmity, disability, disease, sickness, or psychiatric/psychological condition at the time of the incident(s) described in the complaint? If so, what was the nature of the infirmity, disability, or sickness?

Answer:

No.

8. Did you consume any alcoholic beverages or take any drugs or medications within 12 hours before the time of each incident(s) described in the complaint? If so, state the type and amount of alcoholic beverages, drugs, or medication which were consumed, and when and where you consumed them.

Answer:

No.

9. Describe each injury (physical, emotional, mental) for which you are claiming damages in this case, specifying the part of your body that was injured, the nature of the injury, and as to any injuries you contend are permanent, the effects on you that you claim are permanent.

Answer:

Plaintiff has suffered severe psychological and emotional injuries, including without limitation, corruption of morals, anxiety, intrusive thoughts, disturbed sleep, impaired concentration, disruption and distortion of normal development, loss of innocence.

Plaintiff's psychological and emotional injuries will be analyzed by a forensic expert, whose opinions and related information will be disclosed in accordance with the expert discovery rules of the Federal Rules of Civil Procedure. Plaintiff further reserves the right to supplement this response in accordance with the Federal Rules of Civil Procedure.

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25. Please describe any statements made to you by any federal or state law enforcement agent or prosecutor regarding the availability of civil remedies against Mr. Epstein and regarding whether there would be any benefit from your voluntary cooperation with law enforcement.

VERIFICATION

[REDACTED] 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.

[REDACTED]

STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

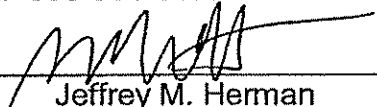
SWORN TO AND SUBSCRIBED before me this 23 day of JANUARY, 2008⁹ by [REDACTED], who is personally known to me or has produced the following identification FLDC which is current or has been issued within the past five years and bears a serial or other identifying number.

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January 24, 2009

Respectfully submitted:

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