

Exhibit C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the Estate of
Jeffrey E. Epstein,

Defendants.

Case No. 19 Civ. 8673 (KPF) (DCF)

**PLAINTIFF JANE DOE’S RESPONSES AND OBJECTIONS TO DEFENDANTS’
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules for the Southern District of New York (together, the “Rules”), Plaintiff Jane Doe, by and through her attorneys, submits these responses and objections (“Responses”) to Defendants Darren K. Indyke and Richard D. Kahn, in their capacities as the executors of the Estate of Jeffrey E. Epstein (“Defendants”) First Request for the Production of Documents dated March 10, 2020.

The Definitions and Instructions below form an integral part of the Requests that follow and must be read in conjunction with the Requests and followed when responding to the Requests.

GENERAL OBJECTIONS AND RESPONSES

The following general objections and responses (the “General Objections”) are incorporated into each specific objection and response (the “Specific Objections”) as if fully set forth therein:

1. Plaintiff objects to the Requests to the extent they are duplicative, cumulative, or seek information that has been or will be provided through other means of discovery.

2. Plaintiff objects to the Requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek information not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.

3. Plaintiff objects to the Requests to the extent they impose any obligations or requirements beyond the scope of the Rules or any case law interpreting them.

4. Plaintiff's Responses are not intended to be and shall not be construed as an agreement or concurrence that all information provided is admissible.

5. Plaintiff objects to each Request to the extent that it calls for documents that: (a) are already in Defendants' possession, custody, or control; (b) are publicly available; or (c) are otherwise independently available to Defendants or their counsel.

6. Plaintiff objects to the Requests to the extent they purport to call for documents or information that: (a) are subject to the attorney-client privilege; (b) constitute attorney work product; (c) are protected from disclosure based on common interest or a similar privilege; or (d) are otherwise protected from disclosure under applicable privilege, law, or rule. Plaintiff will not produce such information in response to the Requests, and any inadvertent production thereof shall not be deemed a waiver of any privilege with respect to such information.

7. Plaintiff objects to the Requests to the extent they seek information protected by federal or state law. Except to the extent permitted by an applicable exception or court order, Plaintiff will not disclose any information in violation of federal or state law.

8. Plaintiff objects to the Requests to the extent they require unreasonable measures to locate and produce responsive documents. Plaintiff will construe the Requests to require a reasonable and diligent search of her reasonably-accessible files where she would reasonably expect to find information, documents, or things related to the Requests, and specifically states

that she will limit her search for electronically stored information by use of identified search terms to be agreed upon by the Parties.

9. Plaintiff objects to the Requests, and in particular, Definitions No. 4 and Instructions Nos. 2 and 4, to the extent that they seek information or documents that are not within Plaintiff's possession, custody, or control. Subject to this General Objection, in responding to the Requests, Plaintiff will provide only responsive, non-privileged documents within Plaintiff's own possession, custody, or control.

10. Plaintiff objects to Instruction No. 3 insofar as it seeks to impose obligations greater than those imposed by the Rules or any other applicable law or rule.

11. Plaintiff objects to Instruction No. 4 insofar as it imposes obligations greater than those imposed by the Rules and it seeks information or documents that are not within Plaintiff's possession, custody, or control.

12. Plaintiff objects to Instruction No. 11 to the extent that it seeks information or documents beyond the time period relevant to the allegations listed in the Complaint (ECF 1).

13. Plaintiff objects to each Request to the extent that it asks Plaintiff to identify "all" documents, communications, information etc., on the ground that each such Request is overly broad and that compliance with each such Request would be unduly burdensome and not proportional to the needs of this case.

14. Plaintiff objects to each Request to the extent that it seeks information or documents beyond the time period relevant to Plaintiff's claims.

15. Plaintiff objects to the Requests to the extent they contain express or implied assumptions of fact or law with respect to matters at issue in this case. Plaintiff's Responses to the Requests are not intended to be and shall not be construed as an agreement or concurrence with

Defendants' characterization of any facts, circumstances, or legal obligations. Plaintiff reserves the right to contest any such characterization as inaccurate.

16. Plaintiff expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and privileges or the inadvertent disclosure by Plaintiff of information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses.

17. The fact that Plaintiff has responded to a particular Request shall not be interpreted as implying that Plaintiff acknowledges the propriety of that Request.

18. Plaintiff's Responses to the Requests are made to the best of Plaintiff's present knowledge, information, and belief. These Responses are at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of Plaintiff's knowledge and investigation, are subject to such additional knowledge of facts as may result from Plaintiff's further discovery or investigation.

19. Plaintiff reserves the right to make any use of, or to introduce at any hearing and at trial, information responsive to the Requests but discovered subsequent to the date of these Responses, including, but not limited to, any such information obtained in discovery herein.

20. Plaintiff reserves all objections or other questions as to the competency, relevance, materiality, privilege, or admissibility of Plaintiff's Responses herein and any documents produced subject thereto, as evidence in any subsequent proceeding in, or trial of, this or any other action, or for any other purpose whatsoever.

21. Plaintiff's Responses to the Requests will be subject to the protections of any Protective Order entered by the Court governing the handling of confidential material in this case.

22. Plaintiff will produce responsive documents pursuant to its General and Specific Objections on a rolling basis.

23. Plaintiff is available to meet and confer with Defendants in an effort to resolve any disputes that may arise concerning these Responses.

SPECIFIC OBJECTIONS AND RESPONSES

REQUEST NO. 1

All documents and communications with or otherwise concerning Decedent. This includes, without limitation, all communications concerning Decedent which are to, from, or which copy: (i) members of the press, media or publishing industry; (ii) law enforcement personnel; (iii) government agents, including, without limitation, prosecutors and government attorneys; and communications which are to, from, or which copy you or your attorneys, on the one hand, and other persons who have filed lawsuits or made claims against Decedent or his estate, or such other persons' attorneys, on the other hand.

RESPONSE TO REQUEST NO. 1

Plaintiff objects to Request No. 1 on the ground that it is overly broad, unduly burdensome, and seeks information not relevant to either party's claims or defenses in this litigation, and will withhold responsive documents and communications, if any, based on this objection. Plaintiff further objects to Request No. 1 to the extent it calls for the production of documents and communications that are subject to the attorney-client privilege, constitute attorney work product, or are otherwise protected from disclosure under applicable privilege, law, or rule, and will withhold responsive documents and communications, if any, based on this objection.

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents and communications concerning the claims and defenses in this litigation and responsive to this request, if any.

REQUEST NO. 2

To the extent not otherwise produced in response to the foregoing, all documents and communications concerning any other legal proceeding or investigation that concerns Decedent.

RESPONSE TO REQUEST NO. 2

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents and communications that are responsive to this request, if any.

REQUEST NO. 3

To the extent not otherwise produced in response to the foregoing, all non-privileged documents and communications concerning this litigation.

RESPONSE TO REQUEST NO. 3

Plaintiff objects to Request No. 3 on the ground that it is overly broad, unduly burdensome, and seeks information not relevant to either party's claims or defenses to the extent that "concerning this litigation" has a meaning other than "concerning the claims and defenses in this litigation" and will withhold responsive documents and communications, if any, based on this objection.

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents and communications concerning the claims and defenses at issue in this litigation, if any.

REQUEST NO. 4

A copy of your birth certificate.

RESPONSE TO REQUEST NO. 4

Plaintiff objects to Request No. 4 on the ground that it seeks information not relevant to either party's claims or defenses, and will withhold responsive documents and communications, if any, based on this objection.

REQUEST NO. 5

Copies of all of your passports.

RESPONSE TO REQUEST NO. 5

Plaintiff objects to Request No. 5 on the ground that it is overly broad, unduly burdensome, and seeks information not relevant to either party's claims or defenses to the extent it requests all Plaintiff's passports, and will withhold responsive documents and communications, if any, based on this objection.

Subject to the General and Specific Objections, Plaintiff will produce a copy of her current passport, if any.

REQUEST NO. 6

Documents sufficient to establish your place of residency at all times during the relevant time period.

RESPONSE TO REQUEST NO. 6

Plaintiff objects to Request No. 6 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase "sufficient to establish."

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents, if any, that demonstrate Plaintiff's residency (1) during the period relevant to the allegations in the Complaint and (2) at present.

REQUEST NO. 7

Documents sufficient to establish your domicile at all times during the relevant time period.

RESPONSE TO REQUEST NO. 7

Plaintiff objects to Request No. 7 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase "sufficient to establish."

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents, if any, that demonstrate Plaintiff's domicile (1) during the period relevant to the allegations in the Complaint and (2) at present.

REQUEST NO. 8

Documents sufficient to identify the location, nature, and scope of your employment during the relevant time period.

RESPONSE TO REQUEST NO. 8

Plaintiff objects to Request No. 8 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase "sufficient to identify" and the terms "nature" and "scope."

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents and communications demonstrating her employment that are responsive to this request, if any.

REQUEST NO. 9

Documents sufficient to identify the source, nature, and scope of all financial support or income you received during the relevant time period.

RESPONSE TO REQUEST NO. 9

Plaintiff objects to Request No. 9 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase "sufficient to identify," and the terms "nature" and "scope."

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents and communications demonstrating her financial support and income that are responsive to this request, if any.

REQUEST NO. 10

Documents sufficient to establish your complete academic history.

RESPONSE TO REQUEST NO. 10

Plaintiff objects to Request No. 10 on the ground that it seeks information not relevant to either party's claims or defenses to the extent that it seeks documents concerning Plaintiff's "*complete* academic history" (emphasis added). Plaintiff further objects to the Request on the ground that it is vague and ambiguous to the extent it uses the undefined phrases "sufficient to establish" and "academic history."

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents that demonstrate Plaintiff's academic history during the relevant time period, if any.

REQUEST NO. 11

Documents sufficient to identify all telephone numbers you used during the relevant time period.

RESPONSE TO REQUEST NO. 11

Plaintiff objects to Request No. 11 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase "sufficient to identify."

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents to identify each of Plaintiff's telephone numbers during the relevant time period, if any.

REQUEST NO. 12

Documents sufficient to identify all email addresses you used during the relevant time period.

RESPONSE TO REQUEST NO. 12

Plaintiff objects to Request No. 12 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase "sufficient to identify."

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents to identify each of Plaintiff's email addresses during the relevant time period, if any.

REQUEST NO. 13

All documents and communications concerning all medical procedures and consultations you received during the relevant time period.

RESPONSE TO REQUEST NO. 13

Plaintiff objects to Request No. 13 on the ground that it is overly broad, unduly burdensome, and seeks information not relevant to either party's claims or defenses to the extent that it seeks documents and communications concerning "*all* medical procedures and consultations" (emphasis added) regardless of the relation to the allegations in the Complaint, and will withhold responsive documents and communications, if any, based on this objection.

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents and communications concerning medical procedures and consultations received by Plaintiff during the relevant time period that relate to allegations of the Complaint, if any.

REQUEST NO. 14

Regardless of date and the relation (or lack thereof) to Decedent's acts and omissions alleged in the Complaint or otherwise, all documents and communications concerning all medical procedures and consultations you received evidencing or otherwise concerning the following conditions:

- a. an eating disorder,**
- b. emotional distress,**
- c. psychological or psychiatric trauma,**
- d. mental anguish,**
- e. humiliation,**
- f. confusion,**
- g. embarrassment,**
- h. loss of self-esteem,**
- i. loss of dignity,**
- j. loss of enjoyment of life,**
- k. pain,**
- l. suffering, or**
- m. any condition that would require surgery to correct.**

RESPONSE TO REQUEST NO. 14

Plaintiff objects to Request No. 14 on the ground that it is overly broad, unduly burdensome, and seeks information not relevant to either party's claims or defenses to the extent that it seeks documents and communications concerning "*all* medical procedures and consultations" regardless of the relation to the allegations in the Complaint and to the extent it requests information for "any condition that would require surgery to correct," and will withhold responsive documents and communications, if any, based on this objection. Plaintiff further objects to Request No. 14 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase "evidencing or otherwise concerning."

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents and communications concerning medical procedures and consultations received by Plaintiff concerning the aforementioned conditions that relate to the allegations in the Complaint, if any.

REQUEST NO. 15

To the extent not otherwise produced in response to the foregoing request and regardless of date and the relation (or lack thereof) to Decedent's acts and omissions alleged in the Complaint or otherwise, all documents and communications evidencing or otherwise concerning your experience of the same or similar conditions and damages for which you seek recovery from Defendants in this litigation.

RESPONSE TO REQUEST NO. 15

Plaintiff objects to Request No. 15 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase "similar conditions and damages" and the term "evidencing."

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents and communications concerning her experience of the same conditions and damages from which she seeks recovery in this litigation, if any.

REQUEST NO. 16

To the extent not otherwise responsive to these requests, all documents and communications concerning anything of value you received from Decedent.

RESPONSE TO REQUEST NO. 16

Plaintiff objects to Request No. 16 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase “anything of value.”

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents and communications concerning anything of monetary value she received from Decedent, if any.

REQUEST NO. 17

To the extent not otherwise responsive to these requests, all documents and communications concerning your allegations in the Complaint.

RESPONSE TO REQUEST NO. 17

Subject to the General Objections, Plaintiff will produce non-privileged documents and communications not otherwise responsive to other Requests concerning the allegations in the Complaint, if any.

REQUEST NO. 18

To the extent not otherwise responsive to these requests, all documents and communications upon which you intend to rely in this litigation, including but not limited to in the course of depositions, in support of any motion, and at any hearing and trial.

RESPONSE TO REQUEST NO. 18

Plaintiff objects to Request No. 18 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase “intend to rely.” Plaintiff objects to Request No. 18 to the extent that it requires Plaintiff to speculate as to which documents and communications Plaintiff may or may not reference later in this litigation.

Subject to the General and Specific Objections, Plaintiff will produce non-privileged documents and communications not otherwise responsive to other Requests that Plaintiff presently plans to rely on in this litigation, if any.

REQUEST NO. 19

To the extent not otherwise produced in response to these requests, all documents and communications evidencing or otherwise concerning any damages you allege you suffered concerning the allegations in your Complaint, including but not limited to all medical fees, attorneys' fees and lost wages.

RESPONSE TO REQUEST NO. 19

Plaintiff objects to Request No. 19 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase "evidencing or otherwise concerning."

Subject to the General Objections, Plaintiff will produce non-privileged documents and communications not otherwise responsive to other Requests concerning Plaintiff's damages suffered as a result of the allegations in the Complaint, if any.

REQUEST NO. 19

All documents identified in your response to Defendants' First Set of Interrogatories to Plaintiff.

RESPONSE TO REQUEST NO. 19

Subject to the General Objections, Plaintiff will produce non-privileged documents not otherwise responsive to other Requests that Plaintiff identified in response to Defendants' First Set of Interrogatories to Plaintiff, if any.

Dated: April 16, 2020
New York, NY

Respectfully submitted,

By: _____



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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the Estate of
Jeffrey E. Epstein,

Defendants.

Case No. 19 Civ. 8673 (KPF) (DCF)

**PLAINTIFF JANE DOE’S RESPONSES AND OBJECTIONS TO
PLAINTIFF’S FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules for the Southern District of New York (together, the “Rules”), Plaintiff Jane Doe, by and through her attorneys, submits these responses and objections (“Responses”) to Defendants Darren K. Indyke and Richard D. Kahn, in their capacities as the executors of the Estate of Jeffrey E. Epstein (“Defendants”) First Set of Interrogatories dated March 10, 2020 (the “Interrogatories”).

GENERAL OBJECTIONS AND RESPONSES

The following general objections and responses (the “General Objections”) are incorporated into each specific objection and response (the “Specific Objections”) as if fully set forth therein:

1. Plaintiff objects to the Interrogatories to the extent they are duplicative, cumulative, or seek information that has been or will be provided through other means of discovery.
2. Plaintiff objects to the Interrogatories to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek information not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.

3. Plaintiff objects to the Interrogatories to the extent they impose any obligations or requirements beyond the scope of the Rules or any case law interpreting them.

4. Plaintiff's Responses are not intended to be and shall not be construed as an agreement or concurrence that all information provided is admissible.

5. Plaintiff objects to the Interrogatories to the extent that they call for documents that: (a) are already in Defendants' possession, custody, or control; (b) are publicly available; or (c) are otherwise independently available to Defendants or their counsel.

6. Plaintiff objects to the Interrogatories to the extent they purport to call for documents or information that: (a) are subject to the attorney-client privilege; (b) constitute attorney work product; (c) are protected from disclosure based on common interest or a similar privilege; or (d) are otherwise protected from disclosure under applicable privilege, law, or rule. Plaintiff will not produce such information in response to the Interrogatories, and any inadvertent production thereof shall not be deemed a waiver of any privilege with respect to such information.

7. Plaintiff objects to the Interrogatories to the extent they seek information protected by federal or state law. Except to the extent permitted by an applicable exception or court order, Plaintiff will not disclose any information in violation of federal or state law.

8. Plaintiff objects to the Interrogatories to the extent they require unreasonable measures to locate and produce responsive documents. Plaintiff will construe the Interrogatories to require a reasonable and diligent search of her reasonably-accessible files where she would reasonably expect to find information, documents, or things related to the Interrogatories, and specifically states that she will limit her search for electronically stored information by use of identified search terms to be agreed upon by the Parties.

9. Plaintiff objects to the Interrogatories to the extent that they include "discrete subparts" but are listed as one individual Interrogatory, pursuant to Rule 33(a)(1).

10. Plaintiff objects to Definition No. 1 to the extent that it imposes obligations greater than those imposed by the Rules.

11. Plaintiff objects to the Interrogatories, and in particular, Definitions No. 4 and Instructions No. 5, to the extent that they seek information or documents that are not within Plaintiff's possession, custody, or control. Subject to this General Objection, in responding to the Requests, Plaintiff will provide only responsive, non-privileged documents within Plaintiff's possession, custody, or control.

12. Plaintiff objects to Instruction No. 7 to the extent it calls for speculation.

13. Plaintiff objects to each Interrogatory to the extent that it asks Plaintiff to identify "each" or "all" persons, documents, communications, etc., on the ground that each such Interrogatory is overly broad and that compliance with each such Interrogatory would be unduly burdensome and not proportional to the needs of this case.

14. Plaintiff objects to each Interrogatory to the extent that it seeks information or documents beyond the time period relevant to the allegations in the Complaint.

15. Plaintiff objects to the Interrogatories to the extent they contain express or implied assumptions of fact or law with respect to matters at issue in this case. Plaintiff's Responses are not intended to be and shall not be construed as an agreement or concurrence with Defendants' characterization of any facts, circumstances, or legal obligations. Plaintiff reserves the right to contest any such characterization as inaccurate.

16. Plaintiff expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and privileges or the inadvertent disclosure by Plaintiff of information or documents protected by such rights or privileges shall not constitute

a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses.

17. The fact that Plaintiff has responded to a particular Interrogatory shall not be interpreted as implying that Plaintiff acknowledges the propriety of that Interrogatory.

18. Plaintiff's Responses to the Interrogatories are made to the best of Plaintiff's present knowledge, information, and belief. These Responses are at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of Plaintiff's knowledge and investigation, are subject to such additional knowledge of facts as may result from Plaintiff's further discovery or investigation.

19. Plaintiff reserves the right to make any use of, or to introduce at any hearing and at trial, information responsive to the Interrogatories but discovered subsequent to the date of these Responses, including, but not limited to, any such information obtained in discovery herein.

20. Plaintiff reserves all objections or other questions as to the competency, relevance, materiality, privilege, or admissibility of Plaintiff's Responses herein and any documents produced subject thereto, as evidence in any subsequent proceeding in, or trial of, this or any other action, or for any other purpose whatsoever.

21. Plaintiff's Responses to the Interrogatories will be subject to the protections of any Protective Order entered by the Court governing the handling of confidential material in this case.

SPECIFIC OBJECTIONS AND RESPONSES**INTERROGATORY NO. 1**

Identify all persons with knowledge of information concerning the subject matter of this litigation, and the subject matter of their knowledge.

RESPONSE TO INTERROGATORY NO. 1

Plaintiff objects to Interrogatory No. 1 as overly broad, unduly burdensome, and seeking information that is not relevant to any party's claims or defenses and disproportionate to the needs of this case to the extent it requests the identification of all persons with knowledge of information concerning "the subject matter of the litigation." Plaintiff further objects to Interrogatory No. 1 on the ground that it is vague and ambiguous to the extent it uses the phrase "the subject matter of this litigation." Plaintiff further objects to Interrogatory No. 1 on the ground that it calls for Plaintiff to speculate as to the scope of someone else's knowledge.

Subject to the General and Specific Objections, Plaintiff identifies the following persons whom Plaintiff believes have direct, relevant knowledge or information about the allegations in the Complaint:

Name	Subjects of Information
Sarah Kellen	The allegations in the Complaint, including that Jeffrey Epstein repeatedly sexually abused Doe in his home between 2002 and 2005.
Lesley Groff	The allegations in the Complaint, including that Jeffrey Epstein repeatedly sexually abused Doe in his home between 2002 and 2005.
Dr. Dawn Hughes	Jeffrey Epstein's sexual abuse of Plaintiff, including psychological impact of that abuse.
[REDACTED]	Jeffrey Epstein's sexual abuse of Plaintiff.
Assistant U.S. Attorney Alexander Rossmiller, Esq.	The allegations in the Complaint.
Diarmuid White, Esq.	Jeffrey Epstein's retention of Mr. White to represent Plaintiff in connection with a criminal investigation into Epstein's sexual abuse of minors.
[REDACTED]	The allegations in the Complaint.
[REDACTED]	The allegations in the Complaint.

	The allegations in the Complaint.
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INTERROGATORY NO. 2

Identify and describe the computation of each category of damages for which you seek recovery in this litigation.

RESPONSE TO INTERROGATORY NO. 2

Plaintiff objects to Interrogatory No. 2 on the basis that it requires expert opinion to determine the computation of each category of damages.

Subject to the General and Specific Objections, Plaintiff discloses that she is entitled to recover damages in the form of, *inter alia*, actual damages, compensatory damages, statutory damages, consequential damages, punitive damages, attorneys' fees, costs, and interest.

INTERROGATORY NO. 3

Identify the existence, custodian and location of, and generally describe, all documents and communications concerning the subject matter of this litigation.

RESPONSE TO INTERROGATORY NO. 3

Plaintiff objects to Interrogatory No. 3 as overly broad, unduly burdensome, and seeking information that is not relevant to any party's claims or defenses and disproportionate to the needs of this case to the extent it requests the identification of all documents and communications concerning "the subject matter of the litigation." Plaintiff further objects to Interrogatory No. 3 on the ground that it is vague and ambiguous to the extent it uses the phrases "generally describe" and "the subject matter of this litigation."

Subject to the General and Specific Objections, Plaintiff will identify non-privileged, responsive documents and communications concerning the allegations in the Complaint, if any, when such communications are produced in response to Defendants' First Requests for Production ("Defendants' RFPs"), subject to Plaintiff's general and specific responses and objections thereto.

Plaintiff refers Defendants to Plaintiff's Responses and Objections to Plaintiff's First Requests for Production of Documents ("Plaintiff's RFP Responses").

INTERROGATORY NO. 4

Identify each employee of, agent of, or other individual associated with Decedent with whom you communicated or interacted; and identify the date of, and describe the nature of, each such communication or interaction.

RESPONSE TO INTERROGATORY NO. 4

Plaintiff objects to Interrogatory No. 4 on the ground that it is vague and ambiguous to the extent it uses the phrase "associated with."

Subject to the General and Specific Objections, Plaintiff first refers Defendants to the Complaint and the allegations therein. Plaintiff also identifies Sarah Kellen and Lesley Groff. Plaintiff states that she interacted with Kellen and Groff between approximately 2002 and 2005 to schedule her visits to Decedent's Upper East Side mansion, and that Kellen and Groff periodically made payments to Plaintiff on Decedent's behalf during that time. Plaintiff further states that she interacted with other individuals employed by and/or associated with Decedent in his Upper East Side mansion, including maids, butlers/doormen, and drivers, among others, between approximately 2002 and 2005.

INTERROGATORY NO. 5

Describe with particularity all duties owed to you by Decedent.

RESPONSE TO INTERROGATORY NO. 5

Plaintiff objects to Interrogatory No. 5 on the ground that it is vague and ambiguous to the extent it uses the phrase "duties owed to you." Plaintiff further objects to Interrogatory No. 5 on the ground that it calls for a legal conclusion.

Subject to the General and Specific Objections, for information concerning the nature of the relationship between Decedent and Plaintiff, Plaintiff refers Defendants to the Complaint and the allegations therein, as well as Plaintiff's RFP Responses.

INTERROGATORY NO. 6

Identify and describe with particularity each act or omission on the part of Decedent that you allege constitutes a breach of a duty owed to you. For each act or omission identified, identify the date of the alleged act or omission, all persons with knowledge of the facts set forth in your response to this interrogatory, and all documents evidencing or otherwise concerning the information set forth in your response to this interrogatory.

RESPONSE TO INTERROGATORY NO. 6

Plaintiff objects to Interrogatory No. 6 on the ground that it is vague and ambiguous to the extent it uses the undefined term "evidencing." Plaintiff further objects to Interrogatory No. 6 on the ground that it calls for a legal conclusion. Plaintiff further objects to Interrogatory No. 6 on the ground that it calls for Plaintiff to speculate as to the scope of someone else's knowledge.

Subject to the General and Specific Objections, for information concerning the interactions between Decedent and Plaintiff, Plaintiff refers Defendants to the Complaint and the allegations therein, as well as Plaintiff's RFP Responses.

INTERROGATORY NO. 7

Identify and describe with particularity each act or omission on the part of Decedent that you allege constitutes a violation of New York Penal Law § 130. For each act or omission identified, identify the date of the alleged act or omission, all persons with knowledge of the facts set forth in your response to this interrogatory, and all documents evidencing or otherwise concerning the information set forth in your response to this interrogatory.

RESPONSE TO INTERROGATORY NO. 7

Plaintiff objects to Interrogatory No. 7 on the ground that it is vague and ambiguous to the extent it uses the undefined term "evidencing." Plaintiff further objects to Interrogatory No. 7 on

the ground that it calls for a legal conclusion. Plaintiff further objects to Interrogatory No. 7 on the ground that it calls for Plaintiff to speculate as to the scope of someone else's knowledge.

Subject to the General and Specific Objections, Plaintiff refers Defendants to Plaintiff's Response to Interrogatory No. 1, the Complaint and the allegations therein, as well as Plaintiff's RFP Responses.

INTERROGATORY NO. 8

Identify with particularity each act or omission on the part of Decedent that you allege constitutes a tort. For each act or omission identified, identify the date of the alleged act or omission, the tort you allege the act or omission constitutes, all persons with knowledge of the information set forth in your response to this interrogatory, and all documents evidencing or otherwise concerning such information.

RESPONSE TO INTERROGATORY NO. 8

Plaintiff objects to Interrogatory No. 8 on the ground that it is vague and ambiguous to the extent it uses the undefined term "evidencing." Plaintiff further objects to Interrogatory No. 8 on the ground that it calls for a legal conclusion. Plaintiff further objects to Interrogatory No. 8 on the ground that it calls for Plaintiff to speculate as to the scope of someone else's knowledge.

Subject to the General and Specific Objections, Plaintiff refers Defendants to Plaintiff's Response to Interrogatory No. 1, the Complaint and the allegations therein, as well as Plaintiff's RFP Responses.

INTERROGATORY NO. 9

Identify all persons other than Decedent who have ever committed or attempted to commit sexual misconduct or offenses against or otherwise concerning you, including, without limitation, any unwelcome behavior of a sexual nature, sexual abuse, sexual assault, threats or intimidation of a sexual nature, or sexual exploitation, regardless of whether the misconduct or offenses involved physical touching. For each person identified, identify the misconduct or offense committed, and the date and location of the misconduct or offense.

RESPONSE TO INTERROGATORY NO. 9

Plaintiff objects to Interrogatory No. 9 as overly broad, unduly burdensome, and seeking information that is not relevant to any party's claims or defenses and disproportionate to the needs of this case to the extent it requests the identification of "*all* persons" who have "committed or attempted to commit sexual misconduct or offenses against or otherwise concerning you," including, for example, "any unwelcome behavior of a sexual nature," regardless of the relation to the allegations in the Complaint and regardless of the severity of the behavior, and to the extent it requests the "location of the misconduct or offense." Plaintiff further objects to Interrogatory No. 9 on the ground that it is vague and ambiguous to the extent it uses the phrases "unwelcome behavior of a sexual nature" and "threats or intimidation of a sexual nature."

Subject to the General and Specific Objections, Plaintiff states that her s [REDACTED]

[REDACTED]

[REDACTED]

INTERROGATORY NO. 10

Identify all medical procedures and consultations you received, including the dates of each procedure and consultation, the locations of each procedure and consultation, and the identities of all medical providers who conducted or otherwise participated in each procedure and consultation. The relevant time period for this interrogatory is the date on which you first learned of Decedent through the date of your responses to these interrogatories.

RESPONSE TO INTERROGATORY NO. 10

Plaintiff objects to Interrogatory No. 10 as overly broad, unduly burdensome, and seeking information that is not relevant to any party's claims or defenses and disproportionate to the needs of this case to the extent it requests the identification of "*all* medical procedures and consultations," regardless of the relation to the allegations in the Complaint and "the identities of *all* medical

providers who . . . otherwise participated in each procedure and consultation,” regardless of his or her role in the procedure or consultation.

Subject to the General and Specific Objections, Plaintiff identifies the following mental and/or physical health care providers who provided treatment or services relevant to the claims and defenses in this action:

Provider	Treatment Type

Plaintiff further refers Defendants to the documents produced in response to Request No. 13 of Defendants’ RFPs.

INTERROGATORY NO. 11

Regardless of date and the relation (or lack thereof) to Decedent’s acts and omissions alleged in the Complaint or otherwise, identify all medical procedures and consultations you received evidencing or otherwise concerning the following conditions:

- a. an eating disorder,**
- b. emotional distress,**
- c. psychological or psychiatric trauma,**
- d. mental anguish,**
- e. humiliation,**
- f. confusion,**
- g. embarrassment,**

- h. loss of self-esteem,**
- i. loss of dignity,**
- j. loss of enjoyment of life,**
- k. pain,**
- l. suffering, or**
- m. any condition that would require surgery to correct**

RESPONSE TO INTERROGATORY NO. 11

Plaintiff objects to Interrogatory No. 11 on the ground that it is overly broad, unduly burdensome, and seeks information not relevant to either party's claims or defenses to the extent that it seeks documents and communications concerning "*all* medical procedures and consultations" regardless of the relation to the allegations in the Complaint and to the extent it requests information for "any condition that would require surgery to correct." Plaintiff further objects to Interrogatory No. 11 on the ground that it is vague and ambiguous to the extent it uses the undefined term "evidencing."

Subject to the General and Specific Objections, Plaintiff refers Defendants to her Response to Interrogatory No. 10 and to the documents produced in response to Request No. 14 of Defendants' RFPs.

INTERROGATORY NO. 12

State whether you have ever experienced the same or similar conditions and damages, for which you seek recovery from Defendants in this litigation, as a result of acts or omissions by persons other than Decedent. If you answer this interrogatory in the affirmative: identify each such person; describe the acts or omissions that resulted in the damages; identify the dates and locations of such acts and omissions; and describe the damages that resulted.

RESPONSE TO INTERROGATORY NO. 12

Plaintiff objects to Interrogatory No. 12 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase "similar conditions and damages." Plaintiff further objects to Interrogatory No. 12 on the ground that it calls for speculation. Plaintiff also objects to

Interrogatory No. 12 on the basis that the determination as to whether Plaintiff has experienced “the same or similar conditions or damages . . . as a result of acts or omissions by persons other than Decedent” calls for an expert opinion.

Subject to the General and Specific Objections, Plaintiff refers Defendants to the forthcoming expert reports in this Litigation.

INTERROGATORY NO. 13

Identify all things of value you received from Decedent, including a description of the thing, the date on which you received the thing, and the person who tendered the thing to you.

RESPONSE TO INTERROGATORY NO. 13

Plaintiff objects to Interrogatory No. 13 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase “things of value.”

Subject to the General and Specific Objections, Plaintiff refers Defendants to the Complaint and the allegations therein, as well as Plaintiff’s Response to RFP No. 16. Plaintiff states that she received numerous cash payments between 2002 and 2005 from Decedent and Decedent’s associates, Sarah Kellen and Lesley Groff, on Decedent’s behalf. Plaintiff further states that she received a shipment of furniture from Decedent to her home in Astoria between 2002 and 2005, delivered by men employed by Decedent.

INTERROGATORY NO. 14

Identify all documents and communications upon which you intend to rely in this litigation, including but not limited to in the course of depositions, in support of any motion, and at any hearing or trial.

RESPONSE TO INTERROGATORY NO. 14

Plaintiff objects to Interrogatory No. 14 on the ground that it is vague and ambiguous to the extent it uses the undefined phrase “intend to rely.” Plaintiff further objects to Interrogatory

No. 14 to the extent that it requires Plaintiff to speculate as to which documents and communications Plaintiff may or may not reference later in this litigation.

Subject to the General and Specific Objections, Plaintiff refers Defendants to documents and communications produced in response to Defendants' RFPs, if any.

INTERROGATORY NO. 15

Identify all documents and communications evidencing or otherwise concerning damages and everything else for which you seek recovery in this litigation, including but not limited to damages you allege in your Complaint, medical fees, attorneys' fees and lost wages.

RESPONSE TO INTERROGATORY NO. 15

Plaintiff objects to Interrogatory No. 15 on the ground that it is vague and ambiguous to the extent it uses the undefined term "evidencing."

Subject to the General and Specific Objections, Plaintiff refers Defendants to documents and communications produced in response to Defendants' RFPs.

Dated: April 16, 2020
New York, NY

Respectfully submitted,

By: _____

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