

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:08-cv-80736-KAM

JANE DOE #1 and JANE DOE #2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

**VICTIMS' SUPPLEMENTAL AUTHORITY IN SUPPORT OF RESPONSE TO
MOTION FOR LIMITED INTERVENTION BY ALAN M. DERSHOWITZ**

COME NOW petitioners Jane Doe No. 1 and Jane Doe 2, as well as movants Jane Doe No. 3 and Jane Doe No. 4 (“the victims”), to provide supplemental authority in support of their Response to Motion Limited Intervention by Alan M. Dershowitz (DE 291).

In their response, the victims argued that a “sinister pattern” existed of persons refusing to provide information about Jeffrey Epstein’s sex trafficking. DE 291 at 15. One of the persons identified as improperly refusing to provide information was Jean Luc Brunel. *Id.* at 16.

Within the last several weeks, victims’ counsel have learned that Brunel has filed a complaint in the Circuit Court for Dade County against Epstein. *See Brunel v. Epstein*, No. 14-21348-CA-01 (11th Jud. Cir. Jan. 26, 2015) (Ex. 1) (available at 2015 WL 129782). In the complaint, Brunel admits that he evaded deposition requests by undersigned counsel on behalf of several of Epstein’s victims. Brunel further alleges that this evasion was due to Epstein’s instructions. Brunel’s complaint alleges that he was told by “Epstein to leave the Palm Beach

area in anticipation of a deposition of Plaintiff Brunel in a [civil¹] case against Epstein. On the direct advice of Epstein, Plaintiff Brunel went to Europe and Asia for a period of time. This was done for the sole purpose of delaying Plaintiff Brunel's deposition." Complaint at ¶ 33.

These admissions by Brunel that he evaded a deposition in the civil cases against Epstein further supports the arguments made by the victims that a sinister pattern of concealment exists. The Court should consider this fact, along with the other evidence, as a further reason supporting denial of the pending motion to intervene.

DATED: April 3, 2015

Respectfully Submitted,

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¹ Brunel's complaint says that the deposition was for a "criminal case." But this is obviously in error, since (as the Court is aware) the potential criminal case against Epstein concluded with the non-prosecution agreement in 2008.

* This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on April 3, 2015, on the following using the Court's CM/ECF system:

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