

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80811-CIV-[REDACTED]

[REDACTED]  
Plaintiff,

vs.

JEFFREY EPSTEIN and [REDACTED]

[REDACTED]  
Defendants.

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**PLAINTIFF'S NOTICE OF SERVING**  
**SECOND AMENDED ANSWERS TO INTERROGATORIES**

COMES NOW the Plaintiff, [REDACTED], by and through undersigned counsel, and hereby files this Notice with the Court that Second Amended Answers to Interrogatories propounded by the Defendant, JEFFREY EPSTEIN, on January 16, 2009, have been furnished to the attorney for the Defendant.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail this 28 day of October, 2009, to. See attached list of counsel.

[REDACTED]  
JACK SCAROLA  
Florida Bar No.: 169440  
JACK P. HILL  
Florida Bar No.: 0547808  
Searcy Denney Scarola Barnhart & Shipley, P.A.  
[REDACTED]

[REDACTED]  
[REDACTED]  
Attorney for Plaintiff(s)



**PLAINTIFF'S NOTICE OF SERVING**  
**SECOND AMENDED ANSWERS TO INTERROGATORIES**

3. List all former names and when you were known by those names. State all addresses where you have lived for the past 10 years, the dates you lived at each address, your Social Security number, your date of birth, and, if you are or have ever been married, the name of your spouse or spouses. List any children by name, date of birth and the father's name and address. List the names and address of your parents and any brother or sister.

**ANSWER**

Nickname-[REDACTED]

[REDACTED] Dates: July, 2007-Present  
West Palm Beach, FL. 33417

[REDACTED] Dates: February, 2004- July, 2007  
West Palm Beach, FL.

Rome, Georgia Dates: August, 2003-February, 2004

[REDACTED] Dates: About 2 ½ years ago  
West Palm Beach, FL. 33409

[REDACTED] Dates: Approximately 1 year  
West Palm Beach, FL. 33409

[REDACTED] Dates: Unknown  
Lake Park, FL

SSN-[REDACTED] DOB-[REDACTED]

I have never been married.

Children:[REDACTED]

Father:[REDACTED]

Address:[REDACTED]

West Palm Beach, FL. 33407

Father: [REDACTED]  
Address: West Palm Beach, FL.

Parents: [REDACTED])  
Address Unknown

[REDACTED])  
West Palm Beach, FL. 33417

Siblings: [REDACTED])  
[REDACTED]  
West Palm Beach, FL. 33417

5. Please provide the name, address, telephone number, place of employment and job title of any person who has, claims to have or whom you believe may have knowledge or information pertaining to any fact alleged in the pleadings (as defined in Federal Rule of Civil Procedure 7(a) filed in this action, or any fact underlying the subject matter of this action).

**ANSWER**

1. [REDACTED]  
c/o her attorneys:

Jack Scarola, Esq. and Jack P. Hill, Esq.  
Searcy Denney Scarola Barnhart & Shipley, P.A.  
[REDACTED]

West Palm Beach, FL 33409  
Tel: [REDACTED]

Richard Willits, Esq.  
Richard H. Willits, P.A.  
[REDACTED]

Lake Worth, FL 33461  
Tel: [REDACTED]

Subject matter: Plaintiff.

2. Jeffrey Epstein  
c/o his attorneys:

**Robert Critton, Esquire**  
**Burman Critton Luttier & Coleman LLP**  
[REDACTED]

**West Palm Beach, FL 33414**  
Tel: [REDACTED]

**Jack A. Goldberger, Esquire**  
**Atterbury, Goldberger & Weiss, P.A.**  
[REDACTED]

**West Palm Beach, FL 33401**  
Tel: [REDACTED]

**Bruce E. Reinhart, Esquire**  
**Bruce E. Reinhart, P.A.**  
[REDACTED]

**West Palm Beach, FL 33401**  
Tel: [REDACTED]

**Subject matter: Defendant**

3. [REDACTED]'s mother, [REDACTED], and her brother, [REDACTED]  
c/o [REDACTED]'s attorneys:

**Jack Scarola, Esq. and Jack P. Hill, Esq.**  
**Searcy Denney Scarola Barnhart & Shipley, P.A.**  
[REDACTED]

**West Palm Beach, FL 33409**  
Tel: [REDACTED]

**Richard Willits, Esq.**  
**Richard H. Willits, P.A.**  
[REDACTED]

**Lake Worth, FL 33461**  
Tel: [REDACTED]

**Subject matter: [REDACTED]'s involvement with Epstein.**

4. [REDACTED]  
(Address unknown)

Subject matter: Defendant.

5. Jane Doe (Case No.: 1:93-cv-01109-KAM)  
c/o her attorney:

Theodore Leopold, Esquire  
Leopold, Kuvin, P.A.  
[REDACTED]

Palm Beach Gardens, FL 33410  
Te [REDACTED]

Subject matter: Victim of Epstein.

6. Jane Doe (Case No.: 502008CA020614)  
c/o her attorney:

Isidro M. Garcia, Esquire  
The Law Office of Brad Edwards & Associates, LLC  
[REDACTED]

Subject matter: Victim of Epstein.

7. Jane Doe #2 (Case No.: 9:08-cv-80119-KAM)  
c/o her attorney:

Jeffrey M. Herman, Esquire  
Herman & Mermelstein, P.A.  
[REDACTED]

Subject matter: Victim of Epstein.

8. Jane Doe #3 (Case No.: 9:08-cv-80232-KAM)  
c/o her attorney:

[REDACTED] vs. Epstein, et al.

Case No.: 08-CV-80811-CIV-[REDACTED]

Plaintiff's Second Amended Answers to Defendant's First Interrogatories

**Jeffrey M. Herman, Esquire  
Herman & Mermelstein, P.A.**

Subject matter: Victim of Epstein.

9. Jane Doe #5 (Case No.: 9:08-cv-80381-KAM)  
c/o her attorney:

**Jeffrey M. Herman, Esquire  
Herman & Mermelstein, P.A.**

Subject matter: Victim of Epstein.

10. Jane Doe #4 (Case No.: 9:08-cv-80380-KAM)  
c/o her attorney:

**Jeffrey M. Herman, Esquire  
Herman & Mermelstein, P.A.**

Subject matter: Victim of Epstein.

11. Jane Doe (Case No.: 9:08-cv-80804-KAM)  
c/o her attorney:

**Theodore Leopold, Esquire  
Leopold, Kuvin, P.A.**

Subject matter: Victim of Epstein.

\_\_\_\_\_, vs. Epstein, et al.  
Case No.: 08-CV-80811-CIV-MARRA/JOHNSON  
Plaintiff's Second Amended Answers to Defendant's First Interrogatories

12. Jane Doe #7 (Case No.: 9:08-cv-80993-KAM)  
c/o her attorney;

**Jeffrey M. Herman, Esquire  
Herman & Mermelstein, P.A.**

### **Subject matter: Victim of Epstein.**

13. [REDACTED] (Case No.: 502008CA025129XXXXMB AI  
c/o her attorneys:

**Jack Scarola, Esquire  
Jack P. Hill, Esquire  
Searcy Denney Scarola Barnhart & Shipley, P.A.**

Teles

**Subject matter:** Victim of Epstein.

14. [REDACTED]  
(Address unknown at this time)

**Subject matter:** Jeffrey

15. **Palm Beach Police Department**

**Subject matter:**      **Investigator.**

16. [REDACTED]  
**Palm Beach County Prosecutors Office**

[REDACTED]  
**West Palm Beach, FL 33401**  
**Tel: (561) 355-7100**

**Subject matter: Prosecutor.**

17. **Detective [REDACTED] lead investigator**  
**Palm Beach Police Department**  
[REDACTED]

**Subject matter: Investigator.**

18. [REDACTED]  
[REDACTED]

**Subject matter: Former boyfriend of a victim of Epstein.**

19. **Sgt. [REDACTED]**  
**Palm Beach Police Department**  
[REDACTED]

**Subject matter: Investigator.**

20. [REDACTED]  
[REDACTED]

**Subject matter: Plaintiff's former boyfriend.**

21. **Tony Higgins, supervisor**  
**Sanitation Bureau of the Town of Palm Beach**  
[REDACTED]

[REDACTED] vs. Epstein, et al.

Case No.: 08-CV-80811-CIV-[REDACTED]

Plaintiff's Second Amended Answers to Defendant's First Interrogatories

Tel: ( [REDACTED]

**Subject matter:** The incident which is the subject matter of this lawsuit. Discovery is ongoing.

22.

Palm Beach County Sheriff's Office  
[REDACTED]  
[REDACTED]

**Subject matter:** Investigator.

23.

[REDACTED], friend of [REDACTED]  
(Address will be provided upon receipt)

**Subject matter:** Victim and friend of [REDACTED].

24.

Ghislane Maxwell c/o Ghislane Corp.  
[REDACTED]  
[REDACTED]

**Subject matter:** Associate of Epstein.

25.

Parent Child Center  
[REDACTED]

**Subject matter:** Counselor at Parent Child Center.

26.

Detective [REDACTED]  
Palm Beach Police Department  
[REDACTED]  
[REDACTED]

**Subject matter:** Investigator.

27.

Chief [REDACTED]  
Palm Beach Police Department  
[REDACTED]

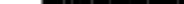
\_\_\_\_\_ vs. Epstein, et al.  
Case No.: 08-CV-80811-CIV-MARRA/JOHNSON  
Plaintiff's Second Amended Answers to Defendant's First Interrogatories

Tel:

**Subject matter:** **Investigator.**

28.  (Address unknown at this time)

**Subject matter:** Associate of Epstein who facilitated introductions with various victims.

29.   
(Address unknown at this time)

**Subject matter:** Employee of Epstein.

30. Detective [REDACTED]  
Palm Beach Police Department

Subject matter: Investigator

31. [REDACTED]  
First Assistant U.S. Attorney  
U.S. Dept. of Justice

Teil:

Subject matter: Federal prosecutor.

32. [REDACTED] Federal Bureau of Investigation

**Subject matter:** **Investigator.**

33. [REDACTED] Address will be provided upon receipt  
West Palm Beach

Subject matter: [REDACTED]'s physician.

34. [REDACTED] Assistant U.S. Attorney  
U.S. Dept. of Justice  
[REDACTED]  
[REDACTED]  
Tel: [REDACTED]

Subject matter: Federal prosecutor.

35. [REDACTED], friend of [REDACTED] mother  
(Address will be provided upon receipt)

Subject matter: Friend of [REDACTED] mother.

36. [REDACTED] friend of [REDACTED]'s mother  
(Address will be provided upon receipt)

Subject matter: Friend of [REDACTED]'s mother

37. [REDACTED], friend of [REDACTED]  
(Address will be provided upon receipt)

Subject matter: Potential victim and friend of [REDACTED].

38. [REDACTED]  
(Address unknown at this time)

Subject matter: Associate of Epstein who may have been involved  
in encounters between Epstein and [REDACTED].

39. [REDACTED], friend of [REDACTED]  
(Address unknown at this time)

40. [REDACTED] (last name unknown), friend of [REDACTED]  
(Address unknown at this time)

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

11. *What is the name of the author of the book you are reading?*

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 (dates) and where you consumed them.

## ANSWER

1. On one occasion I had taken "Morning Glory" and "Angel Trumpets". I do not recall the date.
2. On more than one occasion I used cocaine powder. I do not recall the dates.
3. On more than one occassion I used marijuana. I do not recall the dates.

11. List the names and business addresses of each physician (including psychiatrist, psychologist, chiropractor or medical provider) who has treated or examined you, and each medical facility where you have received any treatment or examination for the injuries for which you seek damages in this case; and state as to each the date of treatment or examination and the injury or condition for which you were examined or treated.

## ANSWER

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**Date:** I do not recall the date.  
I would defer to the Doctor's records.

████████ vs. Epstein, et al.

Case No.: 08-CV-80811-CIV-████████

Plaintiff's Second Amended Answers to Defendant's First Interrogatories

████████ Date: Since high school. Ongoing.  
████████ Date: I do not recall the dates,  
████████

15. List all dates you allege you were at Mr. Epstein's home in Florida, include date, time arrived and left, the name(s) of anyone who went with you to the home when you were there, the time spent with Mr. Epstein and the name(s) and address of any individuals who were present in the home with Mr. Epstein and you.

**ANSWER**

From May or June of 2002 to August of 2003 I went to Mr. Epstein's home on average 2 times a week. There were weeks when I would go 4 times a week. All my visit dates were maintained by Jeffrey Epstein and his staff in a phone message book kept on a table by the phone in the kitchen.

Please refer to #5 above and #16 below.

**Discovery is ongoing.**

16. State in detail how you came to be at Mr. Epstein's home on each occasion, i.e. did someone bring you or ask you if you would or wanted to go; if so, state the name and address of that individual and what he/she told you and the purpose of your visit.

**ANSWER**

I was introduced to Jeffrey Epstein by my friend █████ in 2002. I was to give Jeffrey Epstein a massage. I continued to provide massages up until August of 2003. I was transported to Jeffrey Epstein's house by Yellow Cab, provided by Jeffrey Epstein, █████ my ex- boyfriend █████, my mother █████ and my brother █████. I was also transported via private car provided by Jeffrey Epstein.

████████  
(Address will be provided upon receipt)

[REDACTED] vs. Epstein, et al.

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Plaintiff's Second Amended Answers to Defendant's First Interrogatories

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

**ANSWER**

[REDACTED] Age: 22

[REDACTED]  
I was paid \$100.00

[REDACTED] (last name unknown)  
(Address unknown)  
I was paid \$100.00

[REDACTED]  
(Address unknown)  
I was paid \$100.00

████████ vs. Epstein, et al.

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Plaintiff's Second Amended Answers to Defendant's First Interrogatories

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Signature of Answering Party

STATE OF Florida )

COUNTY OF Palm Beach )

The foregoing instrument was acknowledged before me this \_\_\_\_\_ day of February, 2009 by ██████████ who is personally known to me or who has produced \_\_\_\_\_ (type of identification) as identification and who did/did not take an oath.

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Notary Public  
State of Florida at Large  
My Commission expires:  
Commission No:

[REDACTED] vs. Epstein, et al.

Case No.: 08-CV-80811-CIV-[REDACTED]

Plaintiff's Second Amended Answers to Defendant's First Interrogatories

**COUNSEL LIST**

Jack A. Goldberger  
Atterbury, Goldberger & Weiss, P.A.  
[REDACTED]

Phone: [REDACTED]  
Attorneys for Jeffrey Epstein

Bruce E. Reinhart, Esquire  
Bruce E. Reinhart, P.A.  
[REDACTED]

Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for [REDACTED]

Robert Critton  
Burman Critton Luttier & Coleman LLP  
[REDACTED]

Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

Richard H. Willits, Esquire  
Richard H. Willits, P.A.  
[REDACTED]  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Party

**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 )  
COUNTY OF PALM BEACH ) ss  
 )

SWORN TO AND SUBSCRIBED before me this 26 day of October, 2009 by  
[REDACTED], who is personally known to me or has produced the following  
identification \_\_\_\_\_.



MICHAEL DANUCHUK  
Notary - Print Name

Michael I Danchuk  
Notary - Signature

(SEAL)