

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80811-CIV-MARRA/JOHNSON

[REDACTED]

Plaintiff(s),

vs.

JEFFREY EPSTEIN and [REDACTED]

[REDACTED]

Defendant(s).

PLAINTIFF'S INITIAL DISCLOSURE

COMES NOW the Plaintiff, [REDACTED], by and through her undersigned attorneys, and hereby files her Initial Disclosure in compliance with the Joint Discovery Plan/Scheduling Report dated August 18, 2008, as follows:

(A) Name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claim or defenses, unless solely for impeachment, identifying the subjects of the information:

1. [REDACTED]
c/o her attorneys:

Jack Scarola, Esq. and Jack P. Hill, Esq.
 Searcy Denney Scarola Barnhart & Shipley, P.A.
 2139 Palm Beach Lakes Boulevard
 West Palm Beach, FL 33409
 Tel: [REDACTED]

Richard Willits, Esq.
 Richard H. Willits, P.A.
 2290 10th Avenue North, Suite 404
 Lake Worth, FL 33461
 Tel: [REDACTED]





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Subject matter: Plaintiff.

- 2. Jeffrey Epstein
c/o his attorneys:

Robert Critton, Esquire
 Burman Critton Luttier & Coleman LLP
 515 North Flagler Drive, Suite 400
 West Palm Beach, FL 33414
 Tel: [REDACTED]

Jack A. Goldberger, Esquire
 Atterbury, Goldberger & Weiss, P.A.
 250 Australian Avenue South
 West Palm Beach, FL 33401
 Tel: [REDACTED]

Bruce E. Reinhart, Esquire
 Bruce E. Reinhart, P.A.
 250 South Australian Avenue
 Suite 1400
 West Palm Beach, FL 33401
 Tel: [REDACTED]

Subject matter: Defendant

- 3. [REDACTED]

c/o [REDACTED]

Jack Scarola, Esq. and Jack P. Hill, Esq.
 Searcy Denney Scarola Barnhart & Shipley, P.A.
 2139 Palm Beach Lakes Boulevard
 West Palm Beach, FL 33409
 Tel: [REDACTED]

Richard Willits, Esq.
 Richard H. Willits, P.A.
 2290 10th Avenue North, Suite 404
 Lake Worth, FL 33461
 Tel: [REDACTED]

Subject matter: [REDACTED] involvement with Epstein.

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4. ██████████
(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.
2925 P.G.A. Boulevard, Suite 200
Palm Beach Gardens, FL 33410
Tel: (██████████)

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
2028 Harrison Street, Suite 202
Hollywood, FL 33020
Tel: ██████████

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.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: ██████████

Subject matter: Victim of Epstein.

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

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: █

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.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: █

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.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: █

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.
2925 P.G.A. Boulevard, Suite 200
Palm Beach Gardens, FL 33410
Tel: █

Subject matter: Victim of Epstein.

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17. █

Subject matter: Investigator.

18. █

Subject matter: Former boyfriend of a victim of Epstein.

19. █

Subject matter: Investigator.

20. █

Subject matter: Plaintiff's former boyfriend.

21. █, supervisor
Sanitation Bureau of the Town of Palm Beach
█

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

22. █
Palm Beach County Sheriff's Office
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█

Subject matter: Investigator.

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23. ██████████
(Address will be provided upon receipt)
Subject matter: Victim and friend of ██████████
24. Ghislane Maxwell c/o Ghislane Corp.
3580 Brillo Way
Palm Beach, FL 33480
Subject matter: Associate of Epstein.
25. Susan Pope
██████████
Subject matter: Counselor at Parent Child Center.
26. ██████████
██████████
Subject matter: Investigator.
27. ██████████
██████████
Subject matter: Investigator.
28. ██████████
(Address unknown at this time)
Subject matter: Associate of Epstein who facilitated introductions with various victims.
29. Alfredo Rodriguez
(Address unknown at this time)
Subject matter: Employee of Epstein.

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30.

█

Subject matter: Investigator

31.

█
First Assistant U.S. Attorney
U.S. Dept. of Justice

█

Subject matter: Federal prosecutor.

32.

█

Subject matter: Investigator.

33.

Dr. Thys
Address will be provided upon receipt
West Palm Beach

Subject matter: █ physician.

34.

█
ue
01

Subject matter: Federal prosecutor.

35.

█
(Address will be provided upon receipt)

Subject matter: Friend of █ mother.

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(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

All damages recoverable for personal injury under Florida law including the following:

- suffered bodily injury;
- pain and suffering;
- disability;
- disfigurement;
- mental anguish;
- loss of the capacity for the enjoyment of life; and
- Medical and nursing care and treatment.

The economic damages have not yet been calculated. The noneconomic damages are for the jury's determination.

Statutory damages pursuant to 18 USCA §2255.

Punitive damages.

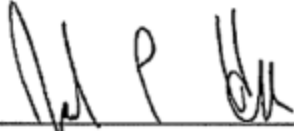
(D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgment." Fed.R.Civ.P.26(a):

Plaintiff is unaware of any applicable insurance policies. Discovery is ongoing.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
U.S. Mail to all counsel on the attached list, this 2nd day of February, 2009.



Jack Scarola
Florida Bar No.: 169440

██████████
Jack P. Hill
Florida Bar No.: 0547808

██████████
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: ██████████
Fax: ██████████
Attorneys for Plaintiff

█ vs. Epstein, et al.

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SERVICE LIST

Richard H. Willits, Esquire
Richard H. Willits, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, FL 33461
Phone: █
Fax: █

Robert Critton, Esquire
Burman Critton Luttier & Coleman LLP
515 North Flagler Drive, Suite 400
West Palm Beach, FL 33414
Phone: █
Fax: █

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
West Palm Beach, FL 33401
Phone: █

Bruce E. Reinhart, Esquire
Bruce E. Reinhart, P.A.
250 South Australian Avenue
Suite 1400
West Palm Beach, FL 33401
Phone: █
Fax: █