

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA-JOHNSON

JANE DOE NO. 2,

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

DEFENDANT JEFFREY EPSTEIN'S RESPONSE & OBJECTIONS TO
SECOND REQUEST FOR PRODUCTION, dated December 19, 2008

Defendant, JEFFREY EPSTEIN, by and through his undersigned attorneys, serves his responses and objections to the Request to Produce, dated December 19, 2008 and states:

Request No. 1. All policies of insurance, including the declarations page and all binders, amendments, and endorsements, covering Defendant's residence at 358 El Brillo Way, Palm Beach, FL 33480.

Response: Objection, overly broad, not relevant and material and not calculated to lead to the discovery of admissible evidence. Plaintiff alleged claims occurred during a specific time period in 2004 – 2005, yet to be specifically identified. Yet, no time period whatsoever is set forth in the Request for Production. Additionally, Defendant objects in that the policies contain value and/or asset information which is not relevant, material nor calculated to lead to the discovery of admissible evidence at this point in time; said information is both private and confidential.

EXHIBIT "C"

1/26/09

Certificate of Service

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S. Mail and facsimile to the following addressees this 26th day of January, 2009.

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Co-Counsel for Defendant Jeffrey Epstein

Respectfully submitted,

By: 
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