

July 21, 2008

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: _____

C.M.A.,

08-80811-Civ-ZLOCH/SNOW

Plaintiff,

vs.

JEFFREY EPSTEIN and
[REDACTED]

Defendants.

NOTICE OF REMOVAL

In accordance with 28 U.S.C. §§ 1441, 1446, and 1332(a)(1), the defendants, Jeffrey Epstein and S [REDACTED] hereby remove this action¹ from Palm Beach County Circuit Court to the United States District Court for the Southern District of Florida, and respectfully state as follows:

1. This case is within the original jurisdiction of this Court.

This case is properly removable because it falls within the original jurisdiction of the United States District Court for the Southern District of Florida. See 28 U.S.C. § 1332(a)(1) (establishing that federal district courts have original

¹ *C.M.A. v. Epstein et al.*, Case No. 50 2008 CA 005240 XXXX MB (Fla. 15th Cir. Ct. filed Feb. 21, 2008).

Lewis Tein P.L.
ATTORNEYS AT LAW

3059 GRAND AVENUE, SUITE 340, COCONUT GROVE, FLORIDA 33133

jurisdiction over cases where the amount “in controversy [is more than \$75,000] . . . and [when the controversy] is between citizens of different states”).

2. The amount in controversy in this action exceeds \$75,000.

The Complaint contains a generic prayer for relief.² It is clear, however, that the plaintiff seeks more than \$75,000 in damages. This case seeks damages in connection with alleged sexual misconduct. (Compl. ¶¶ 6–7.) The Complaint alleges that [REDACTED] has “suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.” (Compl. ¶ 9.) These are serious allegations. *Cf., e.g., Woods v. Southwest Airlines, Co.*, 523 F. Supp. 2d 812, 820 (N.D. Ill. 2007) (determining, in the context of diversity jurisdiction, that the \$75,000 threshold had been satisfied, and “clearly [surpassed],” based on “the nature of the injuries alleged” in the complaint); *see also Williams v. Best Buy Co., Inc.*, 269 F.3d 1316, 1319 (11th Cir. 2001) (“When [a] complaint does not claim a specific amount of damages, removal from state court is proper if it is facially apparent from the complaint that the amount in controversy exceeds the jurisdictional requirement.”).

² The Complaint seeks damages for “[more than] . . . \$15,000.” (Compl. ¶ 1.) This boilerplate is routinely used in Florida pleading practice to trigger application of section 26.012, Florida Statutes, the statute that establishes the jurisdictional amount required for filing in Florida’s Circuit Court (as opposed to County Court).

Further, the allegations by this plaintiff are virtually identical to allegations made in four separate civil actions, filed by four different plaintiffs, against Mr. Epstein in federal court.³ In each of those actions, the plaintiffs are seeking damages in excess of \$50 million - - well over the \$75,000 amount-in-controversy requirement for diversity jurisdiction. *See Jane Doe No. 2* at D.E. 1 ¶ 4; *Jane Doe No. 3* at D.E. 1 ¶ 4; *Jane Doe No. 4* at D.E. 1 ¶ 4; *Jane Doe No. 5* at D.E. 1 ¶ 4.

3. There is complete diversity.

Diversity jurisdiction requires complete diversity. *Carden v. Arkoma Assocs.*, 494 U.S. 185, 187 (1990) (“Since its enactment, we have interpreted the diversity statute to require ‘complete diversity’ of citizenship.” (citing *Strawbridge v. Curtiss*, 7 U.S. (3 Cranch) 267, 267–68 (1806))); *see also MacGinnitie v. Hobbs Group, LLC*, 420 F.3d 1234, 1239 (11th Cir. 2005) (stating that “[c]omplete diversity requires that no defendant in a diversity action be a citizen of the same state as any plaintiff”). As demonstrated below, this case satisfies the statutory requirement of complete diversity.

(a) Plaintiff [REDACTED] is a citizen of Florida. (Compl. ¶ 2.)

³ *See Jane Doe No. 2 v. Jeffrey Epstein*, No. 08-CV-80119-KAM (S.D. Fla. filed Feb. 6, 2008); *Jane Doe No. 3 v. Jeffrey Epstein*, No. 08-CV-80232-KAM (S.D. Fla. filed Mar. 5, 2008); *Jane Doe No. 4 v. Jeffrey Epstein*, No. 08-CV-80380-KAM (S.D. Fla. filed Apr. 14, 2008); *Jane Doe No. 5 v. Jeffrey Epstein*, No. 08-80381-CV-KAM (S.D. Fla. filed Apr. 14, 2008).

(b) While the Complaint suggests that Mr. Epstein might be a citizen of New York or Florida, he is, in fact, a citizen of the U.S. Virgin Islands. (Epstein Aff. Ex. A.)⁴

(c) Contrary to the allegations in the Complaint, Defendant Sarah Kellen is a citizen of New York, not Florida. (Kellen Stmt. Ex. B.)

4. This Notice satisfies the procedural requirements of 28 U.S.C. § 1446.

First, in accordance with 28 U.S.C. § 1446(b), this Notice is timely. Only defendant Epstein has been served with process. Defendant [REDACTED] has not yet been served. *See Hill Dermaceuticals, Inc. v. RX Solutions, United Health Group, Inc.*, No. 6:08-cv-330-Orl-31KRS, 2008 WL 1744794, at *3 (M.D. Fla. Apr. 11, 2008) (concluding that removal petition was timely where it was filed within 30 days after the last defendant was served).

Second, in accordance with section 1446(d), defendants have served this Notice of Removal on July 21, 2008.

Third, in accordance with section 1446(b), all of the defendants join this Petition and consent to removal.

⁴ District courts may consider affidavits and other evidence to support removal jurisdiction. *See Sierminski v. Transouth Fin. Corp.*, 216 F.3d 945, 949 (11th Cir. 2000).

5. The State Court docket has been filed.

All papers filed in the State Court are attached to this Removal Petition.

Conclusion

Because this is a civil action between citizens of different states, excluding any fraudulently joined parties, and the amount in controversy exceeds \$75,000, exclusive of interests and costs, this Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1).

WHEREFORE, the defendants, Jeffrey Epstein and [REDACTED] remove this case from Palm Beach Circuit Court to the United States District Court for the Southern District of Florida.

Respectfully submitted,

LEWIS TEIN, P.L.
3059 Grand Avenue, Suite 340
Coconut Grove, Florida 33133
Tel: 305 442 1101
Fax: 305 442 6744

By: 

GUY A. LEWIS
Fla. Bar No. 623740
lewis@lewistein.com
MICHAEL R. TEIN
Fla. Bar No. 993522
tein@lewistein.com

ATTERBURY, GOLDBERGER & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
Tel. 561 659 8300
Fax. 561 835 8691

By: Jack A. Goldberger
Fla. Bar No. 262013
jgoldberger@agwpa.com

Attorneys for Defendant Jeffrey Epstein

BRUCE E. REINHART, P.A.
250 South Australian Avenue
Suite 1400
West Palm Beach, Florida 33401
Tel. 561202 6360
Fax. 561 828 0983

By: Neil H. Tein FOR
Bruce E. Reinhart
Fla. Bar No. 10762
BREinhart@brucereinhardt.com

Attorneys for Defendant Sarah Kellen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document is being served this day,
July 21, 2008, on counsel of record identified on the service list by U.S. Mail.



Michael R. Tein

Service List

Richard H. Willits, Esq.
Richard H. Willits, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, Florida 33461
Fax: 561-588-8819
Counsel for Plaintiff C.M.A.

EXHIBIT A

AFFIDAVIT OF JEFFREY EPSTEIN

I, Jeffrey Epstein, being duly sworn, do depose and state as follows:

1. My name is Jeffrey Epstein, and I am over 18 years of age and otherwise competent to testify.
2. I am a citizen and resident of the U.S. Virgin Islands.
3. My permanent address is in the U.S. Virgin Islands.

FURTHER AFFIANT SAYETH NAUGHT.



 JEFFREY EPSTEIN

Sworn before me this 19 day of July 2008



Notary Public
 State of Florida
 My commission expires:

NOTARY PUBLIC-STATE OF FLORIDA
 Michael R. Tein
 Commission # DD581058
 Expires: AUG. 03, 2010
 BONDED THRU ATLANTIC BONDING CO., INC.

EXHIBIT B

STATEMENT OF [REDACTED]


I, Sarah Kellen, state as follows, based on my personal knowledge:

1. I am over 18 years of age and otherwise competent to testify.
2. I am a citizen and resident of New York, New York.
3. My permanent address is in New York, New York.
4. I have not resided in Florida at any time during the pendency of *Jane*

Doe v. Jeffrey Epstein, Case No. 50 2008 CA 00656 XXXX MB AB, including upon the removal of that case to federal court.

PURSUANT TO 28 U.S.C. § 1746, I STATE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED ON: JULY 19, 2008.



SARAH KELLEN

STATE COURT PLEADINGS

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.:

SD 2008 CA 005240 XXXX MB AF

[Redacted] Plaintiff,

vs.

JEFFREY EPSTEIN, and [Redacted]
Defendants.

COMPLAINT

Plaintiff, [Redacted], sues the Defendants, JEFFREY EPSTEIN and SARAH KELLEN, and alleges:

1. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000.00), exclusive of costs and interest.
2. At all times material hereto, the Plaintiff, [Redacted] was and is a resident of Palm Beach County, Florida. Plaintiff is a female who is presently twenty-one years old.
3. The Plaintiff is unsure of the residency of defendant JEFFREY ESPSTEIN, because he has residences in New York, Florida, New Mexico, and also outside of the continental United States.
4. The defendant, [Redacted] was a resident of Florida.

COUNT I

- 5. Plaintiff incorporates into this count the allegations of paragraphs 1 through 3.
- 6. On numerous occasions while the Plaintiff was a minor, beginning when she was fourteen, the defendant, JEFFREY EPSTEIN intentionally induced and/or seduced the Plaintiff into performing various acts of lewd and lascivious conduct and/or sexual performances in his presence. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
- 7. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN performed various acts of lewd and lascivious conduct in the presence of the Plaintiff. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
- 8. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN touched the Plaintiff's breasts and genitalia. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
- 9. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST JEFFREY EPSTEIN, IN AN AMOUNT IN EXCESS OF FIFTEENTHOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST, AND FURTHER DEMANDS TRIAL BY JURY.

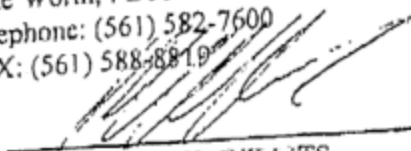
COUNT II

- 10. Plaintiff incorporates into this count the allegations of paragraphs 1 through 4, and paragraphs 6 through 9.

- 11. For each and every occurrence of sexual abuse of the Plaintiff while she was a minor for which JEFFREY EPSTEIN was responsible, he was aided, assisted, and/or abetted by [REDACTED] who lived at the Palm Beach mansion of JEFFREY EPSTEIN. Said acts included, but were not limited to, the following:
 - a. She often called the Plaintiff, when the Plaintiff was a minor, to arrange for the Plaintiff to come to the Palm Beach mansion of JEFFREY EPSTEIN, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
 - b. She observed the Plaintiff being brought to the Palm Beach mansion of JEFFREY EPSTEIN, when the Plaintiff was a minor, and sometimes escorted the Plaintiff to a room in that mansion where JEFFREY EPSTEIN was waiting, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
 - c. She sometimes paid the Plaintiff for the "sessions" with JEFFREY EPSTEIN.
 - d. She made telephone calls to the Plaintiff, when the Plaintiff was a minor, to arrange for gifts to be sent to the Plaintiff.
 - e. She took photographs of the Plaintiff, when the Plaintiff was a minor, which depicted the Plaintiff in the nude. She told the Plaintiff that the pictures were at the request of JEFFREY EPSTEIN, and paid the Plaintiff for posing for the photographs.
- 12. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST SARAH KELLEN, IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST AND FURTHER DEMANDS TRIAL BY JURY.

RICHARD H. WILLITS, P.A.
 2290 10th Avenue North, Suite 404
 Lake Worth, FL 33461
 Telephone: (561) 582-7600
 FAX: (561) 588-8819

By: 
 RICHARD H. WILLITS
 Florida Bar No.: 139888

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

502008 CA 005240 XXXX MB AF
CASE NO.: _____
JUDGE: _____

C.M.A.,
Plaintiff,

vs.

JEFFREY EPSTEIN, and SARAH KELLEN,
Defendants.

II. TYPE OF CASE (Place an X in one box only. If the case fits more than one type of case,
select the most definitive.)

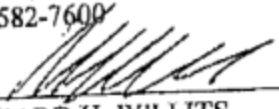
- | DOMESTIC RELATIONS | TORTS | OTHER CIVIL |
|---|---|---|
| <input type="checkbox"/> Simplified dissolution | <input type="checkbox"/> Professional Malpractice | <input type="checkbox"/> Contracts |
| <input type="checkbox"/> Dissolution | <input type="checkbox"/> Products Liability | <input type="checkbox"/> Condominium |
| <input type="checkbox"/> Support - IV-D | <input type="checkbox"/> Auto Negligence | <input type="checkbox"/> Real Property/
Mortgage |
| <input type="checkbox"/> Support - Non IV-D | <input type="checkbox"/> Other Negligence | Foreclosure |
| <input type="checkbox"/> URESA -IV-D | | <input type="checkbox"/> Eminent
Domain |
| <input type="checkbox"/> URESA-Non IV-D | | <input checked="" type="checkbox"/> Other |
| <input type="checkbox"/> Domestic Violence | | |
| <input type="checkbox"/> Other Domestic Relations | | |

III. Is Jury Trial Demanded in Complaint?

- YES
 NO

DATE: 2-15-08

RICHARD H. WILLITS, P.A.
2290 10TH Avenue North, Suite 404
Lake Worth, FL 33461
Attorney for Plaintiff
561-582-7600


RICHARD H. WILLITS
Florida Bar #: 139888


IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.:


Plaintiff,

502008 CA 005240 XXXX MBAA

vs.

JEFFREY EPSTEIN, and 
Defendants.

SUMMONS

TO DEFENDANT: JEFFREY EPSTEIN or 9 East 71st Street
358 El Brillo Way New York, NY 10021
Palm Beach, FL 33480

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint/petition with the Clerk of this Court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

RICHARD H. WILLITS, ESQ.
Plaintiff/Plaintiff's Attorney
2290 10th Avenue North
Suite 404
Lake Worth, Florida 33461
561-582-7600

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this summons and a copy of the complaint in this lawsuit on the above-named defendant.

DATED on FEB 25 2008, 2008

SHARON R. BOCK
Clerk & Comptroller
P.O. Box 4667
West Palm Beach, Florida
33402-4667
CLERK OF THE COURT

(SEAL)



Sheri Paige
AS DEPUTY CLERK

SHERI PAIGE

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea dque el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podiese perder el caso y podria ser depsojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales, Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont ete entreprises contre vous, Vous avez 20 jours consecutifs a partir de la date de l'assignation de cette citation pour deposer une reponse ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes obligé dossier ci-dessus et du nom des parties nommes ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous resquez de perdre la cause ainsi que votre salaire, votre argent, alterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pazz d'avocat, vous pourriez telephoner a un service de reference d'avocat ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egalement, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous.

IF YOU ARE A PERSON WITH A DISABILITY WHICH NEEDS ANY ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PROCEEDING, YOU ARE ENTITLED, AT NO COST TO YOUR, TO THE PROVISION OF CERTAIN ASSISTANCE. PLEASE CONTACT THE ADA COORDINATOR IN THE ADMINISTRATIVE OFFICE OF THE COURT, PALM BEACH COUNTY COURTHOUSE, 205 NORTH DIXIE HIGHWAY, ROOM 5.2500, WEST PALM BEACH, FL 33401; TELEPHONE NUMBER 561-355-2431 WITHIN TWO (2) WORKING DAYS OF YOUR RECEIPT OF THIS SUMMONS; IF YOU ARE HEARING/VOICE IMPAIRED, CALL 1-800-955-8771.

SI OU SE YON MOUN KI INFIM, KI BENZWEN NINPOT AKOMODASYON POU KA PATISIPE NAN PWOSE SA-A, OU GEN DWA, SANL PA KOUTEW ANYIN, POU YO BAW KEK SEVIS. TANPRI KONTAKTE KOODINATE ADA, NAN BIRO ADMINISTRATIF TRIBINAL NAN COTE PALM BEACH, FLORIDA LA, KI NAN 205 NORTH DIXIE HIGHWAY, CHAM 5.2500, WEST PALM BEACH, FLORIDA 33401, NIMERO TELEFONN - NAN SE 561-355-2431, RELE DE (2) JOU DE LE OU RESEVWA CITATION; SI OU BEBE OU BYEN SOUD RELE 1-800-955-8771.

SI UD, ES UNA PERSONA INCAPCITADA QUE NECESITA DE UN SERVICIO ESPECIAL PARA PARTICIPAR EN ESTE PROCESO, UD. TIENE DERECHO A QUE LE PROVEAN CIERTA AYUDA SIN COSTO ALUGNO. POR FAVOR PONGASE EN CONTACTO EL COORDINATR DE LA OFICINA ADMINSTRATIVA DE LA CORTE ADA, SITUADA EN EL 205 NORTH DIXIE HIGHWAY, OFICINA 5.2500, WEST PALM BEACH, FLORIDA 33401, TELEFONE 561-355-2431, DENTRO DE LOS DOS (2) PROXIMOS DIAS HABILES DESPUES DE RECIBIR ESTA CITACION; SI TIENE INCAPACIDAD DE OIR O HABLAR LLAME AL 1-800-955-8771.

SI VOUS ESTES INFIRME, ET EN BESOIN DE NIMPORTE ACCOMMODATION POUR POURVOIR PARTICIPER A CES PROCEDURES, VOUS POUVEZ GRATUITEMENT RECEVOIR, CERTAIN SERVICES. SIL-VOUS-PLAIT CONTACTEZ LE COORDINATEUR DU BUREAU ADMINISTRAIF DE TRIBUNAL DE PALM BEACH, LE TRIBUNAL SE TROUVE A 205 NORTH DIXIE HIGHWAY, CHAMBRE 5.2500, WEST PALM BEACH, FLORIDA 33401, NUMERO DE TELEPHONE 561-355-2431 DURANT DEUX (2) JOURS SUTVANT LA RECEPTION DE CITATION; SI VOUS ETES MUETE OU SOURDS, APPELZ 1-800-955-8771.

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.: 2008CA005240 AF

[Redacted]
Plaintiff,

vs.

JEFFREY EPSTEIN, and [Redacted]
Defendants.

FILED
08 APR 11 PM 4:40
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 9

SUMMONS

TO DEFENDANT: [Redacted] or 9 East 71st Street
358 El Brillo Way Palm Beach, FL 33480 New York, NY 10021

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint/petition with the Clerk of this Court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

RICHARD H. WILLITS, ESQ.
Plaintiff/Plaintiff's Attorney
2290 10th Avenue North
Suite 404
Lake Worth, Florida 33461
561-582-7600

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this summons and a copy of the complaint in this lawsuit on the above-named defendant.

DATED on APR 17 2008, 2008

SHARON R. BOCK
Clerk & Comptroller
CLERK OF THE COURT

(SEAL)



AS DEPUTY CLERK

MARY MCMILLAN

SHARON R. BOCK
Clerk & Comptroller
P.O. Box 4667
West Palm Beach, Florida
33402-4667

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea dque el tribuanl considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podiese perder el caso y podria ser depsojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales, Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont ete entreprises contre vous. Vous avez 20 jours consecutifs a partir de la date de l'assignation de cette citation pour deposer une reponse ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est infuffisant pour vous proteger. Vous etes oblige dossier ci-dessus et du nom des parties nommes ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous resquez de perdre la cause ainsi que votre salaire, votre argent, alterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pazz d'avocat, vous pourriez telephoner a un service de reference d'avocat ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

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SI OU SE YON MOUN KI INFIM, KI BENZWEN NINPOT AKOMODASYON POU KA PATISIPE NAN PWOSE SA-A, OU GEN DWA, SANL PA KOUTEW ANYIN, POU YO BAW KEK SEVIS. TANPRI KONTAKTE KOODINATE ADA, NAN BIRO ADMINISTRATIF TRIBINAL NAN COTE PALM BEACH, FLORIDA LA, KI NAN 205 NORTH DIXIE HIGHWAY, CHAM 5.2500, WEST PALM BEACH, FLORIDA 33401, NIMERO TELEFONN - NAN SE 561-355-2431, RELE DE (2) JOU DE LE OU RESEVWA CITATION; SI OU BEBE OU BYEN SOUD RELE 1-800-955-8771.

SI UD, ES UNA PERSONA INCAPCITADA QUE NECESITA DE UN SERVICIO ESPECIAL PARA PARTICIPAR EN ESTE PROCESO, UD. TIENE DERECHO A QUE LE PROVEAN CIERTA AYUDA SIN COSTO ALUGNO. POR FAVOR PONGASE EN CONTACTO EL COORDINATR DE LA OFICINA ADMINSTRATIVA DE LA CORTE ADA, SITUADA EN EL 205 NORTH DIXIE HIGHWAY, OFICINA 5.2500, WEST PALM BEACH, FLORIDA 33401, TELEFONE 561-355-2431, DENTRO DE LOS DOS (2) PROXIMOS DIAS HABLES DESPUES DE RECIBIR ESTA CITICION; SI TIENE INCAPACIDAD DE OIR O HABLAR LLAME AL 1-800-955-8771.

SI VOUS ESTES INFIRME, ET EN BESOIN DE NIMPORTE ACCOMMODATION POUR POURVOIR PARTICIPER A CES PROCEDURES, VOUS POUVEZ GRATUTTEMENT RECEVOIR, CERTAIN SERVICES. SIL-VOUS-PLAIT CONTACTEZ LE COORDINATEUR DU BUREAU ADMINISTRAIF DE TRIBUNAL DE PALM BEACH, LE TRIBUNAL SE TROUVE A 205 NORTH DIXIE HIGHWAY, CHAMBRE 5.2500, WEST PALM BEACH, FLORIDA 33401, NUMERO DE TELEPHONE 561-355-2431 DURANT DEUX (2) JOURS SUIVANT LA RECEPTION DE CITATION; SI VOUS ETES MUETS OU SOURDS, APPELZ 1-800-955-8771.

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.:

502008 CA 005240 XXXX MB AF

[REDACTED]
Plaintiff,

vs.

JEFFREY EPSTEIN, and [REDACTED]
Defendants.

SUMMONS

TO DEFENDANT: **JEFFREY EPSTEIN**
358 El Brillo Way or 9 East 71st Street
Palm Beach, FL 33480 New York, NY 10021

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint/petition with the Clerk of this Court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

RICHARD H. WILLITS, ESQ.
Plaintiff/Plaintiff's Attorney
2290 10th Avenue North
Suite 404
Lake Worth, Florida 33461
561-582-7600

FAX 561 588-8819

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this summons and a copy of the complaint in this lawsuit on the above-named defendant.

DATED on FEB 25 2008, 2008

SHARON R. BOCK
Clerk & Comptroller
P.O. Box 4667
West Palm Beach, Florida
33402-4667
CLERK OF THE COURT

(SEAL)



Sheri Paige
AS DEPUTY CLERK

SHERI PAIGE

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales, Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont ete entreprises contre vous, Vous avez 20 jours consecutifs a partir de la date de l'assignation de cette citation pour deposer une reponse ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes oblige dossier ci-dessus et du nom des parties nommes ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, alterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pazz d'avocat, vous pourriez telephoner a un service de reference d'avocat ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egalement, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous.

IF YOU ARE A PERSON WITH A DISABILITY WHICH NEEDS ANY ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PROCEEDING, YOU ARE ENTITLED, AT NO COST TO YOUR, TO THE PROVISION OF CERTAIN ASSISTANCE. PLEASE CONTACT THE ADA COORDINATOR IN THE ADMINISTRATIVE OFFICE OF THE COURT, PALM BEACH COUNTY COURTHOUSE, 205 NORTH DIXIE HIGHWAY, ROOM 5.2500, WEST PALM BEACH, FL 33401; TELEPHONE NUMBER 561-355-2431 WITHIN TWO (2) WORKING DAYS OF YOUR RECEIPT OF THIS SUMMONS; IF YOU ARE HEARING/VOICE IMPAIRED, CALL 1-800-955-8771.

SI OU SE YON MOUN KI INFIM, KI BENZWEN NINPOT AKOMODASYON POU KA PATISIPE NAN PWOSE SA-A, OU GEN DWA, SANL PA KOUTEW ANYIN, POU YO BAW KEK SEVIS. TANPRI KONTAKTE KOODINATE ADA, NAN BIRO ADMINISTRATIF TRIBINAL NAN COTE PALM BEACH, FLORIDA LA, KINAN 205 NORTH DIXIE HIGHWAY, CHAM 5.2500, WEST PALM BEACH, FLORIDA 33401, NIMERO TELEFONN - NAN SE 561-355-2431, RELE DE (2) JOU DE LE OU RESEVWA CITATION; SI OU BEBE OU BYEN SOUD RELE 1-800-955-8771.

SI UD, ES UNA PERSONA INCAPCITADA QUE NECESITA DE UN SERVICIO ESPECIAL PARA PARTICIPAR EN ESTE PROCESO, UD. TIENE DERECHO A QUE LE PROVEAN CIERTA AYUDA SIN COSTO ALUGNO. POR FAVOR PONGASE EN CONTACTO EL COORDINATR DE LA OFICINA ADMINSTRATIVA DE LA CORTE ADA, SITUADA EN EL 205 NORTH DIXIE HIGHWAY, OFICINA 5.2500, WEST PALM BEACH, FLORIDA 33401, TELEFONE 561-355-2431, DENTRO DE LOS DOS (2) PROXIMOS DIAS HABILES DESPUES DE RECIBIR ESTA CITICION; SI TIENE INCAPACIDAD DE OIR O HABLAR LLAME AL 1-800-955-8771.

SI VOUS ESTES INFIRME, ET EN BESOIN DE NIMPORTE ACCOMMODATION POUR POURVOIR PARTICIPER A CES PROCEDURES, VOUS POUVEZ GRATUITEMENT RECEVOIR, CERTAIN SERVICES. SIL-VOUS-PLAIT CONTACTEZ LE COORDINATEUR DU BUREAU ADMINISTRAIF DE TRIBUNAL DE PALM BEACH, LE TRIBUNAL SE TROUVE A 205 NORTH DIXIE HIGHWAY, CHAMBRE 5.2500, WEST PALM BEACH, FLORIDA 33401, NUMERO DE TELEPHONE 561-355-2431 DURANT DEUX (2) JOURS SUIVANT LA RECEPTION DE CITATION; SI VOUS ETES MUETS OU SOURDS, APPELZ 1-800-955-8771.

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.:

SD2008 CA 005240 XXXX MB

AF
AF

[Redacted]
Plaintiff,

vs.

JEFFREY EPSTEIN, and [Redacted]
Defendants.

COPY
RECEIVED FOR FILING
FEB 21 2008
SHARON R. BOCK
CLERK & COMPTROLLER
CIRCUIT CIVIL DIVISION

COMPLAINT

Plaintiff, C.M.A. sues the Defendants, JEFFREY EPSTEIN and [Redacted], and alleges:

1. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000.00), exclusive of costs and interest.
2. At all times material hereto, the Plaintiff, [Redacted] was and is a resident of Palm Beach County, Florida. Plaintiff is a female who is presently twenty-one years old.
3. The Plaintiff is unsure of the residency of defendant JEFFREY ESPSTEIN, because he has residences in New York, Florida, New Mexico, and also outside of the continental United States.
4. The defendant, SARAH KELLEN, was a resident of Florida.

COUNT I

5. Plaintiff incorporates into this count the allegations of paragraphs 1 through 3.
6. On numerous occasions while the Plaintiff was a minor, beginning when she was fourteen, the defendant, JEFFREY EPSTEIN intentionally induced and/or seduced the Plaintiff into performing various acts of lewd and lascivious conduct and/or sexual performances in his presence. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
7. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN performed various acts of lewd and lascivious conduct in the presence of the Plaintiff. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
8. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN touched the Plaintiff's breasts and genitalia. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida
9. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST JEFFREY EPSTEIN, IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST, AND FURTHER DEMANDS TRIAL BY JURY.

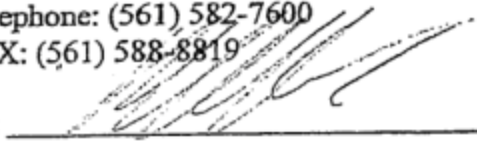
COUNT II

10. Plaintiff incorporates into this count the allegations of paragraphs 1 through 4, and paragraphs 6 through 9.

11. For each and every occurrence of sexual abuse of the Plaintiff while she was a minor for which JEFFREY EPSTEIN was responsible, he was aided, assisted, and/or abetted by [REDACTED], who lived at the Palm Beach mansion of JEFFREY EPSTEIN. Said acts included, but were not limited to, the following:
- a. She often called the Plaintiff, when the Plaintiff was a minor, to arrange for the Plaintiff to come to the Palm Beach mansion of JEFFREY EPSTEIN, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
 - b. She observed the Plaintiff being brought to the Palm Beach mansion of JEFFREY EPSTEIN, when the Plaintiff was a minor, and sometimes escorted the Plaintiff to a room in that mansion where JEFFREY EPSTEIN was waiting, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
 - c. She sometimes paid the Plaintiff for the "sessions" with JEFFREY EPSTEIN.
 - d. She made telephone calls to the Plaintiff, when the Plaintiff was a minor, to arrange for gifts to be sent to the Plaintiff.
 - e. She took photographs of the Plaintiff, when the Plaintiff was a minor, which depicted the Plaintiff in the nude. She told the Plaintiff that the pictures were at the request of JEFFREY EPSTEIN, and paid the Plaintiff for posing for the photographs.
12. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST SARAH KELLEN, IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST AND FURTHER DEMANDS TRIAL BY JURY.

RICHARD H. WILLITS, P.A.
 2290 10th Avenue North, Suite 404
 Lake Worth, FL 33461
 Telephone: (561) 582-7600
 FAX: (561) 588-8819

By: 
 RICHARD H. WILLITS
 Florida Bar No.: 139888

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.: 502008CA005240XXXXMB *AF*

[Redacted]

Plaintiff,

vs.

JEFFREY EPSTEIN, and
Defendants.

[Redacted]

FILED
08 JUL -2 AM 08:23
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 3

AFFIDAVIT OF IMPROPER SERVICE

COMES NOW ERIC LAMAZARES, who after first being duly sworn, deposes and says:

1. He is over the age of 21 and is otherwise competent to testify
2. He has personal knowledge of the facts contained herein.
3. He personally obtained service of process upon the defendant Jeffrey Epstein by posting the process on his residence.
4. Because of the type of service, the undersigned is of the opinion that it may be improper. The attorney for the plaintiff does not concede the issue, but is concerned that the defendant Jeffrey Epstein will contest the validity of that manner of service of process, and that it may be found improper.
5. The defendant Jeffrey Epstein is presently incarcerated in the Palm Beach County Stockade.
6. The attorney for the plaintiff desires personal service on Jeffrey Epstein while he is in the Palm Beach County Stockade.

FURTHER AFFIANT SAYETH NAUGHT.

[Handwritten Signature]
Signature

STATE OF FLORIDA
COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me this 2nd day of July, 2008, by
Margaret Matney.

[Handwritten Signature]
Signature of Notary-State of Florida

Commission Stamp:  NOTARY PUBLIC-STATE OF FLORIDA
Margaret Matney
Commission # DD369285
Expires: NOV 04, 2008
Bonded Thru Atlantic Bonding Co., Inc.

Personally Known OR Produced Identification

Type of identification produced FLDL

JS 44 (Rev. 2/08)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

<p>I. (a) PLAINTIFFS C.M.A.</p> <p>(b) County of Residence of First Listed Plaintiff <u>PALM BEACH COUNTY</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) Attorney's (Firm Name, Address, and Telephone Number) RICHARD H. WILLITS, P.A. 2290 10TH AVENUE NORTH, SUITE 404 LAKE WORTH, FL 33461</p>	<p>DEFENDANTS EPSTEIN, JEFFREY KELLEN, SARAH County of Residence of First Listed Defendant _____ (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT LAND INVOLVED.</p> <p>Attorneys (if known) SEE ATTACHED</p>
--	--

(a) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties in Item III)

08CV80811 WJZ/LSS

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Incorporated or Principal Place of Business in This State	<input type="checkbox"/>	<input type="checkbox"/>
Citizen of Another State	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/>	<input type="checkbox"/>
Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <p style="text-align: center;">PROPERTY RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <p style="text-align: center;">SOCIAL SECURITY</p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSJ (405(g)) <p style="text-align: center;">FEDERAL TAX SUITS</p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	IMMIGRATION	
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Tort to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding 2 Removed from State Court 3 Re-filed- (see VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judgment

VI. RELATED/RE-FILED CASE(S). (See instructions second page.)

a) Re-filed Case YES NO b) Related Cases YES NO

JUDGE MARRA DOCKET NUMBER 08-80119, 08-80232, 08-80380, 08-80381, 08-80736

VII. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

REMOVAL FROM STATE COURT 28 USC 1332 (Diversity)

LENGTH OF TRIAL via _____ days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** _____

CHECK YES only if demanded in complaint: **JURY DEMAND:** Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

SIGNATURE OF ATTORNEY OR PRO. *Richard H. Willits* DATE July 21, 2008

FOR OFFICE USE ONLY

AMOUNT 350 RECEIPT # _____ IFP _____

724505

July 21, 2008

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

ATTACHMENT

DEFENDANTS' ATTORNEYS

Defendant Jeffrey Epstein

Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401

Lewis Tein, P.L.
3509 Grand Avenue, Suite 340
Coconut Grove, Florida 33133

Defendant 

Bruce Reinhart, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401