
GEORGE PETRIDES,

Plaintiff,

-against-

[REDACTED]

Defendant.

NOTICE TO TAKE DEPOSITION

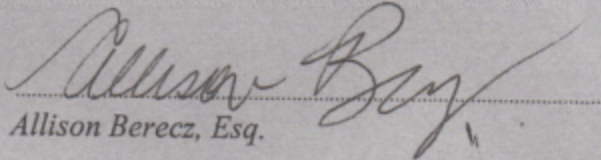
DOBRISH MICHAELS GROSS LLP

*Attorneys for
Plaintiff*

[REDACTED]
New York, New York 10017
[REDACTED]

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.

Dated: January 9, 2013


.....
Allison Berez, Esq.

Service of a copy of the within

is hereby admitted.

Dated:

.....
Attorneys for

-----X
GEORGE PETRIDES,

Plaintiff,

-against -

[REDACTED]

Defendant.

-----X

Index No.: [REDACTED]

**NOTICE TO TAKE
DEPOSITION**

PLEASE TAKE NOTICE, that pursuant to N.Y. C.P.L.R. 3101(a)(4) and N.Y. C.P.L.R. 3107, the deposition upon oral examination of JEFFREY EPSTEIN of the Epstein Foundation, whose home address is 9 East 71st Street, New York, NY 10021, will be taken on the 29th day of January, 2013 at 2:00 p.m. of that day, at the office of the attorney for the Plaintiff, DOBRISH MICHAELS GROSS LLP at 757 Third Avenue, 15th Floor, New York, NY 10017. The circumstances or reasons such disclosure is sought or required are as follows:

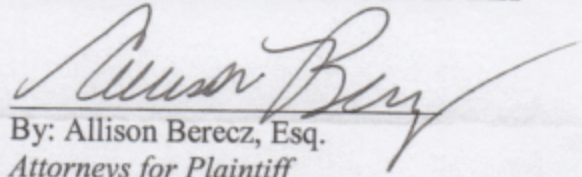
Upon information and belief, the witness possesses information and documents, including prepared records and backup schedules that are material and necessary to the prosecution of this case not reasonably available from any of the other parties in this action.

JEFFREY EPSTEIN is required to produce at the examination the following records and papers in his possession, custody, or control:

1. All records concerning the employment of [REDACTED] including but not limited to all contracts, correspondences, benefit records, compensation records and/or reimbursements records.

Dated: New York, New York
January 9, 2013

DOBRISH MICHAELS GROSS LLP



By: Allison Berez, Esq.
Attorneys for Plaintiff
757 Third Avenue, 15th Floor
New York, NY 10017

TO:

[REDACTED]

New York, NY 10016

[REDACTED]