BSF | BOIES SCHILLER FLEXNER

Sigrid S. McCawley
Telephone: (954) 377-4223
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May 7, 2020

VIA ECF

The Honorable Debra Freeman
Daniel [redacted] Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: [redacted] *v. Darren K. Indyke & Richard D. Kahn*, 19-10476-PGG-DCF

Dear Judge Freeman:

We write on behalf of Plaintiff [redacted] in the above-captioned litigation. Pursuant to Individual Rule II.A and Local Civil Rule 37.2, Plaintiff respectfully requests a pre-motion conference on Plaintiff's anticipated motion to compel Defendants Darren K. Indyke and Richard D. Kahn (1) to produce responsive documents from the Relevant Period as defined in Plaintiff's discovery requests; (2) to produce documents responsive to Plaintiff's requests, not simply documents that directly mention Plaintiff's name; and (3) to respond to Plaintiff's interrogatories.[1] The Court has made clear that discovery in this case would not be stayed pending the approval of the claims administration program or a motion to dismiss absent a contrary order from the Court. *See* Tr. of Nov. 21, 2019 Conf. at 26:10–12. Yet by failing to comply with their clear and unequivocal discovery obligations, including not producing *a single document* to date, Defendants are attempting to grant themselves a *de facto* stay of discovery. Defendants have provided no basis for their delay.

I. Background

Plaintiff alleges that Jeffrey Epstein and his co-conspirators operated a decades-long sex-trafficking scheme by which they recruited young women for sexual abuse. Compl. ¶¶ 22–26. Plaintiff was one of those women. Epstein and his associates trafficked her from California in 2002 and Epstein sexually assaulted her during a massage in New York. *Id.* ¶¶ 36–39, 46–50. After years of suffering in silence due to fear, Plaintiff filed a complaint against Defendants on November 12, 2019.

On January 23, 2020, the parties exchanged initial Rule 26 disclosures. Defendants' Rule 26 Disclosures were vacuous. Defendants provided the name of one witness—Plaintiff—and stated that they were not aware of *any* documents, ESI, or tangible things in their possession, custody, or control that they would use to support their defenses. Exhibit A, Jan. 23, 2020 Initial

[1] Pursuant to Individual Rule I.C., Plaintiff states that she conferred in good faith with Defendants about the issues raised in this letter by telephone on April 27, 2020.

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Disclosures of Defendants Darren K. Indyke and Richard D. Kahn. In response to Defendants' lack of information as to what relevant documents were in their possession, custody, or control, on January 28, 2020, Plaintiff sent them a document preservation notice and identified various email accounts used by Jeffrey Epstein. Exhibit B, Jan. 28, 2020 Document Preservation Notice. Defendants responded on February 3, 2020, by stating that they were abiding by all of their discovery obligations, including their preservation obligations. Exhibit C, Feb. 3, 2020 Letter from B. Moskowitz to S. McCawley.

On March 10, 2020, Plaintiff served 68 Requests for Production ("RFPs") and 14 Interrogatories on Defendants (collectively, Plaintiff's "discovery requests"). In Plaintiff's interrogatories, she again asked Defendants to identify potential witnesses, in addition to email accounts used by Epstein, telephone numbers used by Epstein, and other information to aid Plaintiff in identifying witnesses and the location of evidence necessary to prove her case. On April 16, 2020, after Plaintiff provided Defendants a week-long extension, Defendants served responses and objections in which they ***failed to respond to a single Interrogatory*** (aside from identifying Plaintiff as a witness to her own abuse) and ***failed to produce a single document***. Exhibit D, Defendants' Apr. 16, 2020 Objections and Responses to Plaintiff's First Set of Interrogatories; Exhibit E, Defendants' Apr. 16, 2020 Objections and Responses to Plaintiff's First Request for Production of Documents.

On April 27, 2020, after sending Defendants a letter regarding the clear deficiencies in their responses and objections, Plaintiff met and conferred with Defendants for an hour and a half. *See* Ex. F, Apr. 20, 2020 Letter from S. McCawley to B. Moskowitz. Defendants stated that they had not yet fully processed the ESI in their possession, had not run any searches on the ESI, and were not in a position to provide information about the ESI, despite having received Plaintiff's document retention notice in January and Plaintiff's discovery requests in March. During the meet and confer, Plaintiff also explained her position on the relevance and necessity of each of her discovery requests, and offered to answer any questions that Defendants had about the relevance of any of her requests. Defendants refused to accept the Relevant Period that Plaintiff defined in her discovery requests, and stated that they would only produce documents that reference Plaintiff. They also stated, without providing any legal basis for their position, that they would not produce anything relating to Epstein's sex trafficking or abuse of other victims.

As of today, May 7, 2020, Plaintiff has yet to receive a single document or piece of information responsive to any of her discovery requests, including the documents that specifically reference Plaintiff that Defendants agreed to produce. The only information Defendants have provided to Plaintiff in the course of discovery is their statement that Plaintiff is a witness in this case. Plaintiff has produced more than 10,000 pages of documents responsive to Defendants' discovery requests to date, and has responded to all of Defendants' interrogatories to the best of her ability.

II. Defendants' Objection to the Relevant Period is Improper.

Defendants have improperly objected to the Relevant Period that Plaintiff defined in her discovery requests as January 1, 2002 to the present. Without providing any legal basis for their

position, Defendants contend that the relevant time period should be limited to the year of Plaintiff's sexual assault as alleged in the Complaint.[2]

Under Rule 26 of the Federal Rules of Civil Procedure, parties may obtain discovery "regarding any nonprivileged matter that is relevant to any party's claim or defense." Fed. R. Civ. P. 26(b)(1). "[R]elevance for the purposes of discovery is an extremely broad concept." *Melendez v. Greiner*, No. 01 CIV.07888 SAS DF, 2003 WL 22434101, at *1 (S.D.N.Y. Oct. 23, 2003) (Freeman, J.).

This case turns on (1) whether Jeffrey Epstein sexually trafficked and sexually assaulted Plaintiff and (2) whether Plaintiff's claims are timely, an affirmative defense that Defendants have already raised in a motion to dismiss. ECF No. 27. Discovery from the Relevant Period as defined by Plaintiff is relevant to both Plaintiff's claims and Defendants' statute of limitations defense, and is reasonably calculated to lead to the discovery of admissible evidence.

Epstein's sexual trafficking and assault of Plaintiff occurred in 2002. But Plaintiff has reason to believe, based on publicly available documents, that Epstein and his co-conspirators began trafficking and sexually abusing young girls and women in the same manner that he trafficked and abused Plaintiff in the mid-1990s, and continued to do so up until the date of Epstein's arrest on July 8, 2019. Documents relating to the sexual trafficking and/or sexual assault of others at any point during that period would make the fact that Epstein trafficked and sexually assaulted Plaintiff, the key fact that Plaintiff bears the burden of proving in this case, more probable than it would be without such evidence. *See* Fed. R. Evid. 401. Plaintiff also bears the burden of proving Epstein's intent to sexually assault her. *See Cerilli v. Kezis*, 16 A.D.3d 363, 364 (2d Dep't 2005) ("The elements of battery are bodily contact, made with intent, and offensive in nature."). Evidence that he sexually trafficked and assaulted others would be directly relevant to proving such intent. Such evidence would also likely be admissible at trial. *See* Fed. R. Evid. 415.

Further, Defendants have raised a statute of limitations defense in this matter, ECF No. 27, and Plaintiff contends that they should be equitably estopped from doing so based on Epstein's misconduct. Compl. ¶ 14. Although Plaintiff disagrees with Defendants' interpretation of the case law, Defendants contend that to invoke equitable estoppel, Plaintiff bears the burden of proving that Epstein's "conduct cause[d] her to delay bringing suit," that Epstein "made a definite misrepresentation of fact, and had reason to believe that the plaintiff would rely on it," and that "plaintiff reasonably relied on that misrepresentation." ECF No. 27 at 9. Documents relating to Epstein's misconduct after his abuse of Plaintiff could very well be relevant to equitable estoppel, including to whether Plaintiff reasonably relied on that misconduct in staying silent about her abuse until after Epstein's death.

The fact that Epstein and his co-conspirators carried out a global sex-trafficking operation, which directly injured Plaintiff, for 20 years does not mean that Plaintiff is not entitled to discovery about that operation. Yet Defendants have taken that position and have not indicated any willingness to change it. The Court should direct Defendants to search documents within their possession, custody, or control from the Relevant Period as described in Plaintiff's discovery requests—2002 to the present.

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[2] This is despite the fact that Defendants themselves served discovery requests on Plaintiff in which they defined the relevant time period as "the date on which you first learned of Decedent through the date of your responses to these requests."

III. Defendants Must Produce More than Documents That Explicitly Reference Plaintiff.

In addition to their blanket objection to the production of documents from any year aside from the year during which Plaintiff was herself sexually assaulted, Defendants contend that they will only produce one category of documents: those that specifically mention [redacted]. Defendants have refused, without providing any legal basis for doing so, to produce any document that does not directly reference Plaintiff, regardless of the year.

Defendant cannot broadly object to producing *any documents* that do not directly reference Plaintiff. Documents relevant to Plaintiff's claims and Defendants' defenses go well beyond documents that reference Plaintiff. The following is a small sampling of examples of relevant documents that would not necessarily mention Plaintiff:

- As explained above, documents evidencing Epstein's trafficking and sexual assaults of others, although not about Plaintiff herself, are directly relevant to whether he trafficked and sexually assaulted Plaintiff.

- Epstein's communications with his co-conspirators are likely to evidence the scheme by which Epstein recruited and abused Plaintiff, even if they do not specifically mention Plaintiff. For example, documents in which Epstein and his co-conspirators discuss recruiting young masseuses or arranging for the travel of girls for sexual abuse would corroborate Plaintiff's allegations.

- Documents relating to payments from Epstein to his employees are relevant to whether Epstein paid his employees to keep them quiet, and would be relevant in impeaching witnesses in this case.

- Documents relating to Epstein's silencing, intimidation, and manipulation of victims other than Plaintiff is relevant to establishing whether Plaintiff reasonably feared Epstein, which is relevant to Defendants' statute of limitations defense and Plaintiff's equitable estoppel theory.

Plaintiff explained these theories of relevance during a meet and confer call with Defendants. Without any legal basis, and while purporting to understand Plaintiff's position, Defendants consistently maintained that they would not produce *any document* that does not directly mention [redacted]. This position unwarranted, legally baseless, and unacceptable, and Defendants have not indicated that they are willing to change it. The Court should direct Defendants to search for documents within their possession, custody, or control and not allow Defendants to unilaterally and arbitrarily limit their search to documents that reference Plaintiff's name.

IV. Defendants Must Respond to Plaintiff's Interrogatories.

Plaintiff served 14 interrogatories on Defendants, and Defendants failed to answer a single one, aside from listing Plaintiff as an "individual who may have knowledge concerning the issues in this lawsuit." Ex. D at 3. Plaintiff asked Defendants to identify email accounts used by Epstein or his employees or agents on his behalf—Defendants provided no answer. *Id.* Plaintiff asked Defendants to identify telephone numbers used by Epstein or his employees or agents on his behalf—Defendants provided no answer. *Id.* at 4. Plaintiff asked Defendants to provide a list of Epstein's employees in an effort to identify potential witnesses to Epstein's abuse of Plaintiff and

other victims—Defendants provided no answer. *Id.* This is despite the fact that Defendant Kahn was Epstein's longtime accountant and likely knows who was on Epstein's payroll. This total failure to answer even basic questions about the location of documents and potential witnesses is egregious.

When asked about their failure to respond to any interrogatories, in addition to raising their meritless objections to the Relevant Period and to producing information that does not relate directly to Plaintiff, Defendants stated that they do not have responsive information because Epstein is dead and Defendants do not know where to look for responsive information. Defendants also drew a distinction between their capacities as Epstein's lawyer and accountant, as opposed to their capacities as executors of his Estate, but could not give Plaintiff a clear answer as to their position on how that distinction affects their discovery obligations. For example, Defendants' counsel could not tell Plaintiff whether Darren Indyke—Epstein's longtime lawyer who has ties to Epstein's co-conspirators[3]—or Richard Kahn—Epstein's longtime accountant who assisted him for years with both personal and professional accounting work—had ever been directly asked whether they know of any individuals who might have information about Plaintiff's claims.

Plaintiff still has no understanding of how Defendants have attempted to fulfill their discovery obligations, or of what documents or information are within their possession, custody, or control. At this stage in the litigation, such opaqueness is unacceptable and a clear attempt by Defendants to avoid their discovery obligations in the hopes that the claims administration process comes to fruition. But Defendants cannot unilaterally decide to stay this case. The Court should direct Defendants to respond to Plaintiff's interrogatories.

Respectfully submitted,

/s/ Sigrid S. McCawley

Sigrid S. McCawley, Esq.

cc: Counsel of Record (via ECF)

[3] According to public records, Indyke, for example, helped Ghislaine Maxwell buy her townhouse, was listed on documents relating to one of Maxwell's nonprofits, held a power of attorney over one of Leslie Wexner's properties, and employed Lesley Groff as an executive assistant for his law practice. *See* Julia La Roche et al., *Jeffrey Epstein's Lawyers Deeply Involved in His Business Dealings for Decades, Documents Show*, Yahoo Finance (Aug. 13, 2019), https://finance.yahoo.com/news/jeffrey-epstein-lawyers-darren-indyke-jeffrey-schantz-164305188.html.

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

[redacted], Plaintiff, v. DARREN K. INDYKE and RICHARD D. KAHN in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN, Defendants.	Index No. 1:19-cv-10476-PGG-DCF

INITIAL DISCLOSURES OF DEFENDANTS DARREN K. INDYKE AND RICHARD D. KAHN, CO-EXECUTORS OF THE ESTATE OF JEFFREY E. EPSTEIN

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, the "Co-Executors"), make the following initial disclosures to Plaintiff [redacted]. These disclosures are based on the information reasonably available to the Co-Executors at present. The Co-Executors reserve the right to supplement or modify these disclosures if additional, responsive information is obtained.

The Co-Executors provide this information without any concession, agreement, admission or waiver of any ultimate determination of relevance or admissibility of particular information or testimony for any purpose. The Co-Executors reserve the right to, at trial, call any witness and present any exhibit or other evidence not listed here but identified through discovery or investigation during this action. The Co-Executors do not waive their rights to object to the production of any document or tangible thing based on the attorney-client privilege, the work-product doctrine, relevance, undue burden or any other valid objection.

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INITIAL DISCLOSURES

Rule 26(a)(1)(A)

i. the name, and if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

Response: Plaintiff. Plaintiff is likely to have discoverable information concerning Jeffrey E. Epstein's alleged conduct and Plaintiff's claimed damages, which the Co-Executors may use to support their defenses.

ii. a copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

Response: At present, the Co-Executors are not aware of any such documents, electronically stored information, and tangible things.

iii. a computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

Response: The Co-Executors do not claim damages.

iv. for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Response: At present, the Co-Executors are unaware of any such insurance agreement.

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Dated: New York, New York
January 23, 2020

Respectfully submitted,

TROUTMAN SANDERS LLP
875 Third Avenue
New York, New York 10022

By: */s/ Bennet J. Moskowitz*
Bennet J. Moskowitz

Attorneys for Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein

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CERTIFICATE OF SERVICE

The undersigned certifies that on January 23, 2020, I served a copy of the foregoing Initial Disclosures of Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein, made pursuant to Fed. R. Civ. P. 26(a)(1), by sending them by email to:

Sigrid McCawley
Boies, Schiller & Flexner LLP
401 E. Las Olas Blvd. Suite 1200
Fort Lauderdale, FL, 33301
(954)-377-4223
Email: smccawley@bsfllp.com

s/Bennet J. Moskowitz

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Exhibit B

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Telephone: (954) 356-0011
Email: smccawley@bsfllp.com

January 28, 2020

VIA ELECTRONIC MAIL

Bennet J. Moskowitz
875 Third Avenue
New York, New York 10022

Re: **Document Preservation Notice**
[redacted] *v. Darren K. Indyke and Richard D. Kahn*, 19-10474;
Annie Farmer v. Darren K. Indyke, Richard D. Kahn, and Ghislaine Maxwell, 19-10475;
[redacted] *v. Darren K. Indyke and Richard D. Kahn*, 19-10476;
[redacted] *v. Darren K. Indyke and Richard D. Kahn*, 19-10479;
Jane Doe 1000 v. Darren K. Indyke and Richard D. Kahn, 19-10577;

Dear Mr. Moskowitz:

This is a document preservation notice issued in connection with the above-captioned civil actions. Please read this notice carefully and take all steps necessary to preserve all documents that might be relevant to this dispute. You should take affirmative steps to suspend any automated deletion. The documents covered by this notice are potentially subject to discovery and production in the above-captioned litigation and will be needed as evidence and/or to enable us to prepare fully to take your clients' sworn testimony in a deposition and/or at a trial

Pursuant to Federal Rule of Civil Procedure 26, you were required to identify "all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses." In your Initial Disclosures for [redacted], [redacted], and [redacted], however, you stated that "[a]t present, the Co-Executors are not aware of any such documents, electronically stored information, and tangible things." I assume that you mean that you are not aware that any "documents, electronically stored information, [or] tangible things" that would be supportive of your clients' defenses. If instead you are taking the position that your clients do not have possession, custody, or control over Mr. Epstein's documents (including his electronically stored information), please state so in your reply so that we may bring that to the Court's attention immediately.

At the November 21, 2019, conference Judge Freeman stated: "Counsel should know what their obligations are and those obligations are pretty clear under the law and counsel should take them seriously. If you do not preserve evidence that should be preserved that you had a reason to believe was relevant to claims or defense in the case and that you didn't take steps to preserve, there can be negative consequences down the road." Nov. 21, 2019, Hearing Tr. at 33:4-10. The Court instructed that your preservation efforts should be "broad enough" to documents located at Mr. Epstein's "multiple residences in multiple countries across the world."

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Effective immediately, you should ensure that your clients preserve all documents, whether they exist electronically or in paper files. This includes documents that presently exist, or that are created in the future, in your clients' possession, custody or control, including in common files maintained for your clients.

Subject Matter

Preserve **all documents** that refer to, relate to, mention, or discuss the allegations in Plaintiffs' complaints, including but not limited to any concerning the following subjects and found in the following repositories:

1. The allegations in the Complaints filed in the above referenced matters;
2. The Plaintiffs;
3. Mr. Epstein's sex-trafficking conspiracy;
4. Visitors and/or passengers at any of Mr. Epstein's multiple residences or aircraft where the sex trafficking occurred;
5. Communications between Mr. Epstein and his co-conspirators;
6. Communications between Mr. Epstein and his employees;
7. Communications between Mr. Epstein and any government official regardless of country;
8. Mr. Epstein's flight logs and helicopter logs;
9. Video tapes and photographs taken at Mr. Epstein's properties or on his planes;
10. Financial records;
11. Mr. Epstein's message pads and any phone call logs or phone/contact directories;
12. Amazon.com account details, including order history;
13. Electronic files Mark Lumberg managed on behalf of Mr. Epstein;
14. Mr. Epstein's email accounts, including but not limited to:
    a. "jeffreye@mindspring.com";
    b. "jeeproject@yahoo.com";
    c. "jeevacation@gmail.com";
    d. "zorroranch@aol.com"; and
    e. "epsteinj@wanadoo.fr";
15. Email accounts under the following domains: @Mindspring.com; @earthlink.net; including those used by:
    a. Ghislaine Maxwell;
    b. [redacted];
    c. [redacted]; and
    d. [redacted];

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16. Email accounts for "[redacted]" that Mr. Epstein controlled, including "cecilia@ellmax.com" and "[redacted]".

Please construe this notice as broadly as possible and carefully read the following descriptions.

The definition of "document" is not limited to paper files. A document is literally any kind of record, whether stored electronically or in paper form, whether useful to you or not. *See* S.D.N.Y. Local Civil Rule 26.3 ("Uniform Definitions in Discovery Requests"). A document is any object in your possession that relates to the subject matter identified in this notice, including:

- Email. All of your clients' emails relating to the subject matter, both internal and external, whether in electronic or paper form; this includes anything created or stored on a wireless device or smart phone.
- Computer Files. All other electronic records relating to the subject matter, including but not limited to documents created using Microsoft Office (Word, PowerPoint, Excel, Access, and Visio, for example), and stored anywhere; this includes files stored on your clients' computers, in shared or network drives, home computers, hard disks, CDs, DVDs, flash drives, or anywhere else.
- Video and Audio. Microfilm, audio and video or other visual records, including voice mail, video tapes, DVDs, digital photographs, etc.
- Paper Documents. All paper records—presentations, notes, calendars, day planners, logs, lists, agendas, correspondence, photographs, facsimiles, data or other computer printouts and the like.
- Text Messages. All text or SMS messages, messages sent via WhatsApp or other messaging services.

Please ensure that any of your clients' agents, such as administrative assistants, who may have access to or know of records covered by this notice, are also made aware of the obligation to preserve such material. Please confirm in writing by February 3, 2020, that your clients have preserved and will continue to preserve all documents and communications described above, and all other materials relevant or potentially relevant to the subject matter of the cases.

Sincerely,

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

Exhibit C

Troutman Sanders LLP
875 Third Avenue
New York, New York 10022

troutman.com

Bennet J. Moskowitz
bennet.moskowitz@troutman.com

February 3, 2020

E-MAIL

Sigrid S. McCawley, Esq.
Boies Schiller Flexner LLP
401 East Las Olas Boulevard
Suite 1200
Fort Lauderdale, FL 33301

Re: [redacted], **19-cv-10476;** [redacted], **19-cv-10479;** [redacted], **19-cv-10475;** [redacted], **19-cv-10474;** ***Jane Doe 1000*, 19-cv-10577**

Dear Ms. McCawley:

As you know, we represent Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, the "Co-Executors"), in the above-referenced actions (the "Actions"). We are writing in response to your letter dated January 28, 2020.

You state: "If … you are taking the position that your clients do not have possession, custody, or control over Mr. Epstein's documents (including his electronically stored information), please state so in your reply so that we may bring that to the Court's attention immediately." We have never taken that position. Accordingly, there is nothing to raise with the Court.

Separately, we confirm that our clients are abiding by all of their discovery obligations including preservation obligations. However, your list of subject matters is inappropriate because it is argumentative, assumes many unproven facts not in evidence and is overly broad.[1] Your interpretation of Local Rule 26.3 is likewise inappropriate; we defer to the rule itself.

Very truly yours,

Bennet J. Moskowitz
Bennet J. Moskowitz

[1]It bears mentioning that counsel in another action against the Co-Executors previously attempted to extract positions from us concerning a similar list and, failing that, to obtain relief from Magistrate Freeman. Such counsel obtained no such relief. Nor was any relief necessary given our identical representation in that action that our clients are abiding by their preservation obligations.

Exhibit D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

[redacted],

Plaintiff,

v.

DARREN K. INDYKE and RICHARD D. KAHN in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,

Defendants.

Case No. 1:19-cv-10476-PGG-DCF

DEFENDANTS' OBJECTIONS AND RESPONSES TO PLAINTIFF [redacted] FIRST SET OF INTERROGATORIES TO DEFENDANTS

Defendants Darren K. Indyke and Richard D. Kahn, as co-executors of the estate of Jeffrey E. Epstein (the "Co-Executors"), by their attorneys, pursuant to Federal Rules of Civil Procedure 26 and 33, provide the following responses to Plaintiff [redacted] ("Plaintiff") First Set of Interrogatories to Defendants (the "Interrogatories").

RESERVATION OF RIGHTS

These responses are made solely for the purpose of and in relation to discovery in the above-captioned action. The Co-Executors submit these responses subject to, and without intending to waive, and expressly preserving: (i) any objections as to relevancy, materiality, competency, privilege and admissibility of any documents and information produced in discovery, including without limitation herein; and (ii) the right to object to any other discovery requests. The Co-Executors reserve their right to amend these responses if and when appropriate. Further, these responses are neither an admission nor acceptance of any alleged facts, including without limitation those stated in the Interrogatories.

SPECIFIC OBJECTIONS TO DEFINITIONS

The Co-Executors object to Plaintiff's definition of the term "Jeffrey Epstein" or "Epstein" on the grounds that, insofar as it includes "any entities owned or controlled by Jeffrey Epstein, any employee, agent, attorney, consultant, or representative of Jeffrey Epstein," it is overbroad, unduly burdensome, vague and ambiguous. The Co-Executors will interpret "Jeffrey Epstein" or "Epstein" as Jeffrey E. Epstein.

The Co-Executors also object to Plaintiff's definition of the term "Ghislaine Maxwell" or "Maxwell" on the grounds that, insofar as it includes "any entities owned or controlled by Ghislaine Maxwell, any employee, agent, attorney, consultant, or representative of Ghislaine Maxwell," it is overbroad, unduly burdensome, vague and ambiguous. The Co-Executors will interpret "Ghislaine Maxwell" or "Maxwell" as Ghislaine Maxwell.

The Co-Executors also object to Plaintiff's definition of the term "Massage" on the grounds that it is more expansive than the common use of the term and is inconsistent with the term's usage in the Complaint.

SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1

List the names and addresses of all persons who are believed or known by You, Your agents, or Your attorneys to have any knowledge concerning any of the issues in this lawsuit, and specify the subject matter about which the witness has knowledge.

RESPONSE:

The Co-Executors object to Interrogatory No. 1 on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors also object to Interrogatory No. 1 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and

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unduly burdensome. Subject to and without waiving the foregoing objection, the Co-Executors identify the following individual who may have knowledge concerning the issues in this lawsuit: Plaintiff. The Co-Executors will supplement this response if any additional responsive information is ascertained.

INTERROGATORY NO. 2

Identify all email accounts used by Epstein or any of his employees or agents on his behalf.

RESPONSE:

The Co-Executors object to Interrogatory No. 2 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors further object to this Interrogatory on the grounds it seeks "discovery about discovery," which would result in unnecessary expense. Such matters are more appropriately and cost-effectively addressed in the context of the parties' discussions regarding document discovery. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the production of information outside their possession, custody, and control, and is unconstrained by time.

INTERROGATORY NO. 3

Identify all telephone numbers used by Epstein or any of his employees or agents acting on his behalf, including beepers, Blackberry or PDA devices, cellular phones and land lines in any of his residences, by stating the users name, complete telephone number(s), type of device and name of the service provider.

RESPONSE:

The Co-Executors object to Interrogatory No. 3 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also vague, overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it calls for the production of information outside their possession, custody, and control, and is unconstrained by time. The Co-Executors further object to this Interrogatory on the grounds it seeks "discovery about discovery," which would result in unnecessary expense. Such matters are more appropriately and cost-effectively addressed in the context of the parties' discussions regarding document discovery. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure.

INTERROGATORY NO. 4

Identify all employees, including each employee's position and dates and locations of employment, who performed work or services in or on any property owned, leased, occupied, or used by Epstein, including but not limited Epstein's homes in Palm Beach, Florida, New York City, the U.S. Virgin Islands, New Mexico, London and Paris, and provide the name and contact information of the individual who hired, trained and supervised each employee.

RESPONSE:

The Co-Executors object to Interrogatory No. 4 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds that it assumes facts not in evidence and that the phrase "performed work or services in or on any property" is vague and ambiguous. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the

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attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the production of information outside their possession, custody, and control, and is unconstrained by time.

INTERROGATORY NO. 5

Identify all employees, including each employee's position and dates and location of employment, who performed work as an assistant, scheduler, secretary, masseuse or traveling masseuse for Epstein and provide the name and contact information of the individual who hired, trained and supervised each employee.

RESPONSE:

The Co-Executors object to Interrogatory No. 5 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds that the terms "scheduler" and "traveling masseuse" are vague and ambiguous. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the production of information outside their possession, custody, and control, and is unconstrained by time.

INTERROGATORY NO. 6

Identify all companies and/or persons who provided transportation services to Epstein, whether as an employee or independent contractor, including without limitation drivers, chauffeurs, boat captains, pilots, and aircraft crew, and provide the contact information for each listed person or company.

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RESPONSE:

The Co-Executors object to Interrogatory No. 6 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors also object to this Interrogatory on the grounds that the phrase "transportation services" is vague and ambiguous. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the production of information outside their possession, custody, and control, and is unconstrained by time.

INTERROGATORY NO. 7

Identify all females by name and age for whom Epstein or his employees or agents provided accommodations at 301 East 66th Street, New York, New York for any period of time.

RESPONSE:

The Co-Executors object to Interrogatory No. 7 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it assumes facts not in evidence and on the grounds that the phrase "provided accommodations" is vague and ambiguous. The Co-Executors additionally object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the

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production of information outside their possession, custody, and control, and is unconstrained by time.

INTERROGATORY NO. 8

Identify by name and age all persons who gave a massage or were asked to give a massage to Epstein, Maxwell or a guest, or to whom Epstein or Maxwell gave a massage, at any of Epstein's residences and provide the location of each massage.

RESPONSE:

The Co-Executors object to Interrogatory No. 8 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the production of information outside their possession, custody, and control, and is unconstrained by time.

INTERROGATORY NO. 9

Identify any telecommunications, information technology, or audio-visual technology company that Epstein hired for work in any of his residences or offices and provide the name and contact information for each individual or company listed, in addition to the residence or office serviced.

RESPONSE:

The Co-Executors object to Interrogatory No. 9 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds that the phrase "hired for work" is vague and ambiguous. The Co-Executors additionally

object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the production of information outside their possession, custody, and control, and is unconstrained by time.

INTERROGATORY NO. 10

Identify the method or means in which Maxwell was paid by Epstein or any affiliated entities from 1995 to the present.

RESPONSE:

The Co-Executors object to Interrogatory No. 10 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds that the phrases "method or means in which Maxwell was paid" and "affiliated entities" are vague and ambiguous. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors additionally object to the time period stated in the Request, which is inconsistent with the time frame alleged in the Complaint. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the production of information outside their possession, custody, and control.

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INTERROGATORY NO. 11

Provide detailed quantification for all compensation Maxwell received for any services she performed for the benefit of Epstein or any of his affiliated entities, broken down by year from 1995 to the present.

RESPONSE:

The Co-Executors object to Interrogatory No. 11 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds that the phrase "services she performed for the benefit of Epstein or any of his affiliated entities" is vague and ambiguous. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors additionally object to the time period stated in the Request, which is inconsistent with the time frame alleged in the Complaint. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the production of information outside their possession, custody, and control.

INTERROGATORY NO. 12

Identify any loans or lines of credit issued to Maxwell from Epstein or any affiliated entities, including the amount of the loans, the term of the loans, the interest rate of the loans, and any payments made by Maxwell or on Maxwell's behalf to repay such loans.

RESPONSE:

The Co-Executors object to Interrogatory No. 12 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds that the terms "lines of credit" and "any affiliated entitites" are vague and ambiguous.

The Co-Executors also object to this Interrogatory on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure.

INTERROGATORY NO. 13

Identify the dates, recipients, and purpose of the "two . . . payments, one in the amount of $250,000 and another in the amount of $100,000 to . . . two employees or associates of Mr. Epstein's" referenced by Assistant United States Attorney Alexander Rossmiller at Epstein's bail hearing on July 15, 2019. See Transcript of July 15, 2019 Bail Hearing at 9:15-20, United States v. Epstein, No. 19-cr-490 (RMB) (S.D.N.Y.).

RESPONSE:

The Co-Executors object to Interrogatory No. 13 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case. The Co-Executors also object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure.

INTERROGATORY NO. 14

Identify all persons who have made a claim, complaint, demand or threat against Epstein relating to alleged sexual abuse or misconduct on a female, and for each provide the following information:

a. The person's full name, last known address and telephone number;

b. The person's attorney, if represented

c. The date of the alleged incident(s); and

d. If a civil case has been filed by or on behalf of the person, the case number and identifying information.

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RESPONSE:

The Co-Executors object to Interrogatory No. 14 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors object to this Interrogatory on the grounds that it seeks publicly available information and information already known to Plaintiff or her counsel. The Co-Executors also object to this Interrogatory on the grounds that the terms "claim, complaint, demand or threat" and "misconduct" are overly broad, vague and ambiguous. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it calls for the production of information outside their possession, custody, and control.

Dated: New York, New York
April 16, 2020

TROUTMAN SANDERS LLP

By: */s/Bennet Moskowitz*
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bennet.moskowitz@troutman.com

Attorney for Darren K. Indyke and Richard D. Kahn, as co-executors of the estate of Jeffrey E. Epstein

CERTIFICATE OF SERVICE

The undersigned certifies that on April 16, 2020, I served a copy of the foregoing *Defendants' Objections and Responses to Plaintiff* [redacted] *First Set of Interrogatories to Defendants*, by sending them by email to:

Sigrid McCawley
Boies, Schiller & Flexner LLP
401 E. Las Olas Blvd., Suite 1200
Fort Lauderdale, FL, 33301
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TROUTMAN SANDERS LLP

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Attorney for Darren K. Indyke and Richard D. Kahn, as co-executors of the estate of Jeffrey E. Epstein

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Exhibit E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

[redacted],

Plaintiff,

v.

DARREN K. INDYKE and RICHARD D. KAHN in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,

Defendants.

Case No. 1:19-cv-10476-PGG-DCF

DEFENDANTS' OBJECTIONS AND RESPONSES TO PLAINTIFF [redacted] FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS

Defendants Darren K. Indyke and Richard D. Kahn, as co-executors of the estate of Jeffrey E. Epstein (the "Co-Executors"), by their attorneys, pursuant to Federal Rules of Civil Procedure 26 and 34, provide the following responses to Plaintiff [redacted] ("Plaintiff") First Request for Production of Documents (the "Requests").

RESERVATION OF RIGHTS

These responses are made solely for the purpose of and in relation to discovery in the above-captioned action. The Co-Executors submit these responses subject to, and without intending to waive, and expressly preserving: (i) any objections as to relevancy, materiality, competency, privilege and admissibility of any documents and information produced in discovery, including without limitation herein; and (ii) the right to object to any other discovery requests. The Co-Executors reserve their right to amend these responses if and when appropriate. Further, these responses are neither an admission nor acceptance of any alleged facts, including without limitation those stated in the Requests.

SPECIFIC OBJECTIONS TO DEFINITIONS

The Co-Executors object to Plaintiff's definition of the term "Jeffrey Epstein" or "Epstein" on the grounds that, insofar as it includes "any entities owned or controlled by Jeffrey Epstein, any employee, agent, attorney, consultant, or representative of Jeffrey Epstein," it is overbroad, unduly burdensome, vague and ambiguous. The Co-Executors will interpret "Jeffrey Epstein" or "Epstein" as Jeffrey E. Epstein.

The Co-Executors also object to Plaintiff's definition of the term "Ghislaine Maxwell" or "Maxwell" on the grounds that, insofar as it includes "any entities owned or controlled by Ghislaine Maxwell, any employee, agent, attorney, consultant, or representative of Ghislaine Maxwell," it is overbroad, unduly burdensome, vague and ambiguous. The Co-Executors will interpret "Ghislaine Maxwell" or "Maxwell" as Ghislaine Maxwell.

The Co-Executors also object to Plaintiff's definition of the term "[redacted]" or "[redacted]" on the grounds that, insofar as it includes "any entities owned or controlled by [redacted], any employee, agent, attorney, consultant, or representative of [redacted]," it is overbroad, unduly burdensome, vague and ambiguous. The Co-Executors will interpret "[redacted]" or "[redacted]".

SPECIFIC OBJECTIONS AND RESPONSES TO REQUESTS

REQUEST NO. 1

All Documents relating to Plaintiff, [redacted], whether or not they reference her by name. This Request includes, but is not limited to, all communications, diaries, journals, calendars, blog posts (whether published or not), notes (handwritten or otherwise), memoranda, documentation of car services, airline tickets and/or travel itineraries, accommodations, wire transfer receipts, or any other Documents that concern [redacted] in any way, whether or not they reference her by name.

RESPONSE:

The Co-Executors object to Request No. 1 on the grounds and to the extent that it calls for

the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 1 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome.

Subject to and without waiving these objections and the parties' entry into a mutually acceptable confidentiality agreement and (proposed) order and ESI protocol, the Co-Executors will search for and produce non-privileged documents concerning Plaintiff, if any exist and are located pursuant to mutually agreeable search parameters. The Co-Executors are working to collect and process documents for these purposes and will meet and confer with counsel for Plaintiff about the search as soon as practicable.

REQUEST NO. 2

All telephone records and other Documents reflecting telephone calls made by Epstein or to Epstein, including without limitation cell phone records, telephone logs, and message pads, to or from Epstein's employees.

RESPONSE:

The Co-Executors object to Request No. 2 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 2 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors further object to this Request on the grounds and to the extent that it calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 3

All telephone records and other documents reflecting telephone calls made by Epstein or to Epstein, including without limitation cell phone records, telephone logs, and message pads, to or from Maxwell or [redacted].

RESPONSE:

The Co-Executors object to Request No. 3 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 3 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors further object to this Request on the grounds and to the extent that it calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 4

All telephone records associated with Epstein, Maxwell, or [redacted], including cell phone records, telephone logs, and message pads, that show any communications with [redacted] or members of [redacted] family.

RESPONSE:

The Co-Executors object to Request No. 4 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 4 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically

calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 5

All Documents relating to calendars, schedules, or appointments for Epstein.

RESPONSE:

The Co-Executors object to Request No. 5 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 5 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

REQUEST NO. 6

All Documents relating to contact lists, phone lists, or address books for Epstein.

RESPONSE:

The Co-Executors object to Request No. 6 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 6 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome.

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REQUEST NO. 7

All Documents relating to any Amazon.com account associated with Epstein or Maxwell, including without limitation the purchase order history for each account.

RESPONSE:

The Co-Executors object to Request No. 7 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 7 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

REQUEST NO. 8

All video tapes, audio tapes, photographs, portraits, including film negatives or film slides, CDs, or any other print or electronic media depicting Epstein, Maxwell, or [redacted] in the presence of [redacted].

RESPONSE:

The Co-Executors object to Request No. 8 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors additionally object to this Request as duplicative of Request No. 9. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-

Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

Subject to and without waiving these objections and the parties' entry into a mutually acceptable confidentiality agreement and (proposed) order and ESI protocol, the Co-Executors will search for and produce non-privileged documents concerning Plaintiff, if any exist and are located pursuant to mutually agreeable search parameters. The Co-Executors are working to collect and process documents for these purposes and will meet and confer with counsel for Plaintiff about the search as soon as practicable.

REQUEST NO. 9

All video tapes, audio tapes, photographs, including film negatives or film slides, CDs, or any other print or electronic media depicting or relating to [redacted].

RESPONSE:

The Co-Executors object to Request No. 9 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors additionally object to this Request as duplicative of Request No. 8. The Co-Executors further object to Request No. 9 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

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Subject to and without waiving these objections and the parties' entry into a mutually acceptable confidentiality agreement and (proposed) order and ESI protocol, the Co-Executors will search for and produce non-privileged documents concerning Plaintiff, if any exist and are located pursuant to mutually agreeable search parameters. The Co-Executors are working to collect and process documents for these purposes and will meet and confer with counsel for Plaintiff about the search as soon as practicable.

REQUEST NO. 10

All Documents relating to any communications between Epstein, Maxwell, or [redacted] and [redacted].

RESPONSE:

The Co-Executors object to Request No. 10 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors further object to this Request on the grounds that it seeks information already known to Plaintiff or her counsel.

Subject to and without waiving these objections and the parties' entry into a mutually acceptable confidentiality agreement and (proposed) order and ESI protocol, the Co-Executors will search for and produce non-privileged documents concerning Plaintiff, if any exist and are located pursuant to mutually agreeable search parameters. The Co-Executors are working to collect and process documents for these purposes and will meet and confer with counsel for Plaintiff about the search as soon as practicable.

REQUEST NO. 11

All Documents relating to any communications between Epstein, Maxwell, or [redacted] and any member of [redacted] family.

RESPONSE:

The Co-Executors object to Request No. 11 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 11 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors further object to this Request on the grounds that it seeks information already known to Plaintiff or her counsel.

Subject to and without waiving these objections and the parties' entry into a mutually acceptable confidentiality agreement and (proposed) order and ESI protocol, the Co-Executors will search for and produce non-privileged documents concerning Plaintiff, if any exist and are located pursuant to mutually agreeable search parameters. The Co-Executors are working to collect and process documents for these purposes and will meet and confer with counsel for Plaintiff about the search as soon as practicable.

REQUEST NO. 12

All Documents relating to any communications between Epstein, Maxwell, or [redacted] and Eloisa De Laurentiis.

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RESPONSE:

The Co-Executors object to Request No. 12 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 12 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 13

All Documents relating to any gifts or monetary payments provided to, or for the benefit of, [redacted] by Epstein, Maxwell, [redacted], or any related entity.

RESPONSE:

The Co-Executors object to Request No. 13 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors further object to this Request on the grounds that it seeks information already known to Plaintiff or her counsel.

Subject to and without waiving these objections and the parties' entry into a mutually acceptable confidentiality agreement and (proposed) order and ESI protocol, the Co-Executors

will search for and produce non-privileged documents concerning Plaintiff, if any exist and are located pursuant to mutually agreeable search parameters. The Co-Executors are working to collect and process documents for these purposes and will meet and confer with counsel for Plaintiff about the search as soon as practicable.

REQUEST NO. 14

All Documents relating to Epstein's potential employment of [redacted].

RESPONSE:

The Co-Executors object to Request No. 14 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors further object to this Request on the grounds that it seeks information in Plaintiff's possession.

Subject to and without waiving these objections and the parties' entry into a mutually acceptable confidentiality agreement and (proposed) order and ESI protocol, the Co-Executors will search for and produce non-privileged documents concerning Plaintiff, if any exist and are located pursuant to mutually agreeable search parameters. The Co-Executors are working to collect and process documents for these purposes and will meet and confer with counsel for Plaintiff about the search as soon as practicable.

REQUEST NO. 15

All Documents relating to the California Healing Arts College, or any students or instructors of the California Healing Arts College.

RESPONSE:

The Co-Executors object to Request No. 15 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 15 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 16

All Documents relating to any employee lists or records associated with Epstein or any related entity.

RESPONSE:

The Co-Executors object to Request No. 16 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 16 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome.

REQUEST NO. 17

All Documents relating to payments made from Epstein, or any related entity, to Ghislaine Maxwell, [redacted], [redacted] (a/k/a [redacted]), Lesley Groff, and [redacted] (a/k/a [redacted]), including payments or bonuses for work performed, gifts, real estate purchases, living expenses, business ventures, and payments to Maxwell's charitable endeavors, including the TerraMar project.

RESPONSE:

The Co-Executors object to Request No. 17 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 17 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 18

All Documents relating to any credit card, business, or store account used by Ghislaine Maxwell, [redacted], Lesley Groff, [redacted], or [redacted] that was paid for by Epstein or any related entity.

RESPONSE:

The Co-Executors object to Request No. 18 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 18 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their

possession, custody, and control.

REQUEST NO. 19

All Documents relating to confidentiality or separation agreements between Epstein or any associated entity and any employee or associate of Epstein.

RESPONSE:

The Co-Executors object to Request No. 19 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 19 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

REQUEST NO. 20

All Documents relating to any house staff, employees, or individuals who were compensated by Epstein or any individual or entity affiliated with Epstein, during and/or after employment ceased, including but not limited to the following individuals: Jean Luc Brunel, [redacted], [redacted], [redacted], Lesley Groff, [redacted], [redacted], Luciano "Jojo" Fontanilla, Rosalyn "[redacted]" Fontanilla, Juan Alessi, Maria Alessi, [redacted], Michael Liffman, Cathy and Miles Alexander, [redacted], Floyd [redacted], Brice [redacted], Michael O'Dell, Kate O'Dell, David [redacted], Larry Visoski, David Rodgers, Andy Stewart, Adam [redacted] Lang, Ryon Dionne, [redacted], or Igor Zinoviev.

RESPONSE:

The Co-Executors object to Request No. 20 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 20 on the grounds that, to the extent it seeks

documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 21

All Documents relating to Rinaldo Rizzo from 2002 to the present.

RESPONSE:

The Co-Executors object to Request No. 21 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 21 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 22

All Documents identifying any employees that performed work or services in or on any property owned, occupied, or used by Epstein.

RESPONSE:

The Co-Executors object to Request No. 22 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure.

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The Co-Executors further object to Request No. 22 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 23

All Documents identifying drivers that Epstein employed in New York City from 2002 to the present.

RESPONSE:

The Co-Executors object to Request No. 23 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 23 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 24

All Documents reflecting Your or Epstein's direct or indirect interest or control over business or personal assets of any employee or associate of Epstein, including but not limited to articles of incorporation, power of attorneys, contracts, and meeting minutes.

RESPONSE:

The Co-Executors object to Request No. 24 on the grounds and to the extent that it calls

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for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 24 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to Request No. 24 on the grounds of and to the extent it seeks documents necessarily held in a capacity other than as Co-Executors of the Estate. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

REQUEST NO. 25

All video tapes, audio tapes, photographs, portraits, including film negatives or film slides, CDs, flash drives, memory cards, or any other print or electronic media depicting Epstein in the presence of Maxwell or [redacted].

RESPONSE:

The Co-Executors object to Request No. 25 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 25 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

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REQUEST NO. 26

All Documents relating to Maxwell and [redacted], including but not limited to all Documents relating to communications between Epstein and Maxwell or [redacted].

RESPONSE:

The Co-Executors object to Request No. 26 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 26 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 27

All Documents relating to any agreements (including but not limited to confidentiality agreements, insurance policies or indemnification agreements, employment agreements, separation agreements, or agreements to pay legal fees) between Epstein and Maxwell or Epstein and [redacted], whether such agreements are written, verbal, or merely understood among the parties and not otherwise expressed, whether or not such agreements were ever executed or carried out.

RESPONSE:

The Co-Executors object to Request No. 27 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 27 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome.

The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors also object to this Request on the grounds that the phrase "merely understood among the parties and not otherwise expressed" is vague and ambiguous.

REQUEST NO. 28

All Documents relating to any Joint Defense Agreement entered into between Epstein and Maxwell or Epstein and [redacted].

RESPONSE:

The Co-Executors object to Request No. 28 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 28 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

REQUEST NO. 29

All Documents relating to or describing any work Maxwell or [redacted] performed for or with Epstein or any affiliated entity.

RESPONSE:

The Co-Executors object to Request No. 29 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege,

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attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 29 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 30

All Documents relating to any communications between Epstein or Epstein's attorneys and Maxwell or Maxwell's attorneys related to the issue of sexual abuse of females.

RESPONSE:

The Co-Executors object to Request No. 30 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 30 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 31

All Documents relating to any communications between Epstein or Epstein's attorneys and

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[redacted] or [redacted] attorneys related to the issue of sexual abuse of females.

RESPONSE:

The Co-Executors object to Request No. 31 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 31 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 32

All Documents relating to any communications between Epstein or Epstein's attorneys and Maxwell or Maxwell's attorneys related to the recruitment of any female for any purpose, including socializing or performing any type of work or service.

RESPONSE:

The Co-Executors object to Request No. 32 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 32 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts

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not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 33

All Documents relating to any communications between Epstein or Epstein's attorneys and [redacted] or [redacted] attorneys related to the issue of sexual abuse of females.

RESPONSE:

The Co-Executors object to Request No. 33 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 33 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 34

All Documents relating to any bank account, household account, or financial account identifying Maxwell in any way, including without limitation as an authorized user on the account.

RESPONSE:

The Co-Executors object to Request No. 34 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure.

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The Co-Executors further object to Request No. 34 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors also object to this Request on the grounds that the terms "household account" and "financial account" are vague and ambiguous.

REQUEST NO. 35

All Documents or other media (including photographs) describing or depicting nude or partially nude females, including but not limited to all Documents or other media describing or depicting how such photographs were displayed in any of Epstein's various residences.

RESPONSE:

The Co-Executors object to Request No. 35 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 35 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors further object to this Request on the grounds that it seeks publicly available information and information already known to Plaintiff or her

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counsel.

REQUEST NO. 36

All Documents relating to any payments Epstein made to educational institutions or educational programs and, to the extent the payment was made for the benefit of another person, any Documents reflecting the identity of that person.

RESPONSE:

The Co-Executors object to Request No. 36 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 36 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 37

All Documents relating to any request, proposal or inquiry made by Epstein, Maxwell, or [redacted] to any massage school for recruitment, potential employment, and/or other advancement opportunities and Documents reflecting the identity of any person responding to the request, proposal, or inquiry.

RESPONSE:

The Co-Executors object to Request No. 37 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 37 on the grounds that, to the extent it seeks

documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 38

All Documents relating to calendars, schedules, or appointments for Epstein that relate to visits with or communications with females, excluding immediate family members.

RESPONSE:

The Co-Executors object to Request No. 38 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 38 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 39

All Documents identifying any individuals who ever provided Epstein with a massage.

RESPONSE:

The Co-Executors object to Request No. 39 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege,

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attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 39 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 40

All Documents identifying any individuals who Epstein paid for sexual acts, either with Epstein or with other individuals.

RESPONSE:

The Co-Executors object to Request No. 40 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 40 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 41

All Documents identifying any females recruited or referred by [redacted] or Maxwell for work, sexual acts, or companionship for Epstein.

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RESPONSE:

The Co-Executors object to Request No. 41 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 41 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 42

All Documents relating to any females [redacted] or Maxwell introduced to Epstein for work, sexual acts, or companionship for Epstein.

RESPONSE:

The Co-Executors object to Request No. 42 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 42 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their

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possession, custody, and control.

REQUEST NO. 43

All Documents relating to any females Epstein paid to perform any kind of service, including but not limited to work as an assistant, massage therapist, model, private exercise instructor, dance instructor, or companion.

RESPONSE:

The Co-Executors object to Request No. 43 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 43 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 44

All Documents relating to massages, including but not limited to Documents reflecting recruiting or hiring masseuses, advertising for masseuses, flyers created for distribution at high schools or colleges, and Documents reflecting e-mails or calls to individuals relating to massages.

RESPONSE:

The Co-Executors object to Request No. 44 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 44 on the grounds that, to the extent it seeks

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documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 45

All Documents relating to passports applied for, obtained, or paid for by Epstein on behalf of any female recruited to work for Epstein to perform any kind of service, including but not limited to work as an assistant, massage therapist, model, private exercise instructor, dance instructor, or companion.

RESPONSE:

The Co-Executors object to Request No. 45 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 45 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 46

All Documents relating to Epstein's travel, when that travel was either with Maxwell, [redacted], or other females or to meet Maxwell, [redacted], or other females, including but not limited to documentation of commercial flights, private flights, helicopters, boat charters, and car services,

passport records, records indicating passengers traveling with Epstein, hotel records, and credit card receipts.

RESPONSE:

The Co-Executors object to Request No. 46 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 46 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 47

All Documents, including flight logs, identifying passengers, manifests, or flight plans for any helicopter or plane ever owned, leased, chartered, or controlled by Epstein or any associated entity, from 1995 to the present.

RESPONSE:

The Co-Executors object to Request No. 47 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 47 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to the time period stated in the Request, which is inconsistent

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with the time frame alleged in the Complaint. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 48

All Documents relating to travel with Epstein of any female, including but not limited to documentation of commercial flights, private flights, helicopters, boat charters, and car services, passport records, records indicating passengers traveling with Epstein, hotel records, and credit card receipts.

RESPONSE:

The Co-Executors object to Request No. 48 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 48 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 49

All video tapes, audio tapes, photographs, or any other print or electronic media depicting any of Epstein's residences or aircrafts or inside of any of Epstein's residences or aircrafts.

RESPONSE:

The Co-Executors object to Request No. 49 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege,

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attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 49 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome.

REQUEST NO. 50

All Documents relating to any communications between Epstein or Maxwell and Alan Dershowitz relating to [redacted].

RESPONSE:

The Co-Executors object to Request No. 50 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 50 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

Subject to and without waiving these objections and the parties' entry into a mutually acceptable confidentiality agreement and (proposed) order and ESI protocol, the Co-Executors will search for and produce non-privileged documents concerning Plaintiff, if any exist and are located pursuant to mutually agreeable search parameters. The Co-Executors are working to collect and process documents for these purposes and will meet and confer with counsel for Plaintiff about the search as soon as practicable.

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REQUEST NO. 51

All Documents relating to Eva [redacted] or Glen [redacted].

RESPONSE:

The Co-Executors object to Request No. 51 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 51 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 52

All Documents reflecting or consisting of communications between Jeffrey Epstein and MC2 Models or Jean-Luc Brunel, relating or referring to females coming into the United States from other countries to pursue a career in modeling, including but not limited to letters, notes, and emails.

RESPONSE:

The Co-Executors object to Request No. 52 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 52 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome.

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REQUEST NO. 53

All Documents relating to communications between Epstein and William "Bill" J. Clinton or persons acting on his behalf.

RESPONSE:

The Co-Executors object to Request No. 53 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 53 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 54

All Documents relating to communications between Epstein and Andrew Albert Christian Edward, [redacted] of York (a/k/a Prince Andrew) or persons acting on his behalf.

RESPONSE:

The Co-Executors object to Request No. 54 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 54 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it

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specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 55

All Documents reflecting communications between You or Epstein and John Doe, the intervenor in [redacted] *v. Maxwell*, No. 15-cv-07433-LAP (S.D.N.Y.), or John Doe's attorneys.

RESPONSE:

The Co-Executors object to Request No. 55 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 55 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to Request No. 55 on the grounds of and to the extent it seeks documents necessarily held in a capacity other than as Co-Executors of the Estate. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors further object to this Request on the grounds that it seeks information already known to Plaintiff or her counsel.

REQUEST NO. 56

All Documents relating to Leslie Wexner or Abigail Wexner.

RESPONSE:

The Co-Executors object to Request No. 56 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure.

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The Co-Executors further object to Request No. 56 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds of and to the extent it seeks documents necessarily held in a capacity other than as Co-Executors of the Estate. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 57

All Documents reflecting Your or Epstein's direct or indirect interest or control over business or personal assets of Leslie Wexner or Abigail Wexner, including but not limited to articles of incorporation, power of attorneys, contracts, and meeting minutes.

RESPONSE:

The Co-Executors object to Request No. 57 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 57 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to Request No. 57 on the grounds of and to the extent it seeks documents necessarily held in a capacity other than as Co-Executors of the Estate. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

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REQUEST NO. 58

All Documents relating to any business transactions, including real estate and other financial transactions, between Epstein and Leslie Wexner from 2002 to the present.

RESPONSE:

The Co-Executors object to Request No. 58 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 58 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

REQUEST NO. 59

All Documents relating to Victoria's Secret models or actresses who were ever in the presence of Epstein.

RESPONSE:

The Co-Executors object to Request No. 59 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 59 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the

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extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 60

From January 2012 to the present, all Documents concerning any source of funding for the TerraMar Project or any other not-for-profit entities for which Epstein provided funding, including but not limited to funding for the Clinton Global Initiative, the Clinton Foundation (a/k/a William J. Clinton Foundation, a/k/a/ the Bill, Hillary & Chelsea Clinton Foundation), and the Clinton Foundation Climate Change Initiative.

RESPONSE:

The Co-Executors object to Request No. 60 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 60 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 61

All Documents relating to Epstein's estate planning, will, or any financial transactions that occurred between the date of his arrest on July 6, 2019, and his death on August 10, 2019.

RESPONSE:

The Co-Executors object to Request No. 61 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure.

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The Co-Executors further object to Request No. 61 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome.

REQUEST NO. 62

All Documents relating to communications between Epstein or Epstein's attorneys or agents and any law enforcement entity, including the FBI, NYPD, Palm Beach Police Department, and West Palm Beach Police Department, relating to any criminal investigation, cooperation in any criminal investigation, potential criminal charges, immunity, deferred prosecution, or suspected or known criminal activity.

RESPONSE:

The Co-Executors object to Request No. 62 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 62 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors further object to this Request on the grounds that it seeks publicly available information and information already known to Plaintiff or her counsel.

REQUEST NO. 63

All Documents relating to communications between Epstein and Epstein's attorneys or agents and Alexander Acosta, Maria Villafana, or other attorneys associated with the United States Attorney's Office for the Southern District of Florida.

RESPONSE:

The Co-Executors object to Request No. 63 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure.

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The Co-Executors further object to Request No. 63 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors further object to this Request on the grounds that it seeks publicly available information and information already known to Plaintiff or her counsel.

REQUEST NO. 64

All Documents concerning any action or lawsuit brought against Epstein, Maxwell, or [redacted], including but not limited to actions or lawsuits brought in foreign jurisdictions.

RESPONSE:

The Co-Executors object to Request No. 64 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 64 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors further object to Request No. 64 on the grounds that it seeks publicly available information and information already known to Plaintiff or her counsel. The Co-Executors further object to this Request on the grounds that it seeks publicly available information and information already known to Plaintiff or her counsel.

REQUEST NO. 65

All Documents produced by Epstein or Maxwell in discovery in [redacted] *v. Maxwell*, No. 15-cv-07433-LAP (S.D.N.Y.).

RESPONSE:

The Co-Executors object to Request No. 65 on the grounds and to the extent that it calls

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for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 65 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors further object to this Request on the grounds that it seeks publicly available information and information already known to Plaintiff or her counsel.

REQUEST NO. 66

All Documents seized by any government agency from Epstein's home located at 9 East 71st Street, New York, New York or at 358 El Brillo Way, Palm Beach, Florida.

RESPONSE:

The Co-Executors object to Request No. 66 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 66 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control.

REQUEST NO. 67

All Documents relating to the "two . . . payments, one in the amount of $250,000 and another in the amount of $100,000 to . . . two employees or associates of Mr. Epstein's" referenced by Assistant United States Attorney Alexander Rossmiller at Epstein's bail hearing on July 15, 2019, including Documents sufficient to identify the recipients of those payments. See Transcript of July 15, 2019 Bail Hearing at 9:15-20, United States v. Epstein, No. 19-cr-490

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(RMB) (S.D.N.Y.).

RESPONSE:

The Co-Executors object to Request No. 67 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 67 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome.

REQUEST NO. 68

All Documents relating to Shoppers Travel, including records of payment to Shoppers Travel, communications with Shoppers Travel, or records of any airline tickets, hotel reservations, or other travel accommodations booked through Shoppers Travel by Epstein or his agents or employees for himself or any other person.

RESPONSE:

The Co-Executors object to Request No. 68 on the grounds and to the extent that it calls for the production of documents and information protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object to Request No. 68 on the grounds that, to the extent it seeks documents that are not related to Plaintiff, it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors additionally object to this Request on the grounds and to the extent that it specifically calls for the production of documents and information outside their possession, custody, and control. The Co-Executors also object to this Request on the grounds and to the extent that it assumes facts not in evidence.

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Dated: New York, New York
April 16, 2020

TROUTMAN SANDERS LLP

By: */s/Bennet Moskowitz*

Bennet Moskowitz
875 Third Avenue
New York, New York 10022
Tel: (212) 704- 6087
bennet.moskowitz@troutman.com

Attorney for Darren K. Indyke and Richard D. Kahn, as co-executors of the estate of Jeffrey E. Epstein

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CERTIFICATE OF SERVICE

The undersigned certifies that on April 16, 2020, I served a copy of the foregoing *Defendants' Objections and Responses to Plaintiff* [redacted] *First Request for Production of Documents to Defendants*, by sending them by email to:

Sigrid McCawley
Boies, Schiller & Flexner LLP
401 E. Las Olas Blvd., Suite 1200
Fort Lauderdale, FL, 33301
Email: smccawley@bsfllp.com

TROUTMAN SANDERS LLP

By: /s/*Mary* [redacted] *W. Metcalfe*
Mary [redacted] W. Metcalfe
875 Third Avenue
New York, New York 10022
Tel: (212) 704-6029
marygrace.metcalfe@troutman.com

Attorney for Darren K. Indyke and Richard D. Kahn, as co-executors of the estate of Jeffrey E. Epstein

Exhibit F

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Sigrid S. McCawley
Telephone: (954) 377-4223
Email: smccawley@bsfllp.com

April 20, 2020

VIA EMAIL

Bennet J. Moskowitz
Troutman Sanders LLP
875 Third Avenue
New York, New York 10022
Tel: (212) 704-6087
bennet.moskowitz@troutman.com

Re: [redacted] *v. Indyke et al.*, Case No. 1:19-cv-10476

Dear Bennet:

I write on behalf of Plaintiff [redacted] in response to Defendants' Darren K. Indyke and Richard D. Kahn, as co-executors of the Estate of Jeffrey E. Epstein (the "Estate"), responses and objections to the Plaintiff's discovery requests provided on April 16, 2020. As you likely have anticipated, I specifically write in response to your total failure to respond to your discovery obligations. I ask that we meet and confer about your lack of responses as soon as practicable.

First, as you are aware, Plaintiff served fourteen interrogatories on Defendants. You answered none of them; rather, each interrogatory is met with an assortment of boilerplate objections, ranging from objections to relevancy or "discovery about discovery" or assuming "facts not in evidence" (which is especially puzzling, given that the very purpose of discovery is to find such facts). At best, these objections are deficient; at worst, they are meritless and borderline frivolous.

Similarly, you have failed to adequately respond to most of Plaintiff's document requests. Again, your objections are premised on conclusory objections, ranging from objections to relevancy and claims that certain documents are outside Defendants' possession, custody, and control. As part of your discovery obligations, "generalized objections that discovery requests are vague, overly broad, or unduly burdensome are not acceptable." *Shanchun Yu v. Diguojiaoyu, Inc.*, 18-CV-7303, 2019 WL 6174204, *4-5 (S.D.N.Y. Nov. 20, 2019) (granting plaintiffs' motion to compel discovery after defendants "raised repeated and rote objections to Plaintiffs' document requests, [] refused to provide Plaintiffs any documents whatsoever, and []answered the interrogatories in [a] substantially similar fashion"); *see also Harris v. Bronx Parent Housing Network, Inc.*, 18-CV-11681, 2020 WL 763740, at *2 (S.D.N.Y. Feb. 14, 2020) ("Boilerplate objections that include unsubstantiated claims of undue burden, overbreadth and lack of relevancy, accompanied by a lack of document production or interrogatory response, are a paradigm of discovery abuse.") (internal quotation marks and citation omitted). "A party resisting discovery

has the burden of showing specifically how, despite the broad and liberal construction afforded the federal discovery rules, each interrogatory is not relevant or how each question is overly broad, burdensome or oppressive . . . by submitting affidavits or offering evidence revealing the nature of the burden." *Harris*, 2020 WL 763740, at *2 (internal quotation marks and citations omitted).

Second, your relevance objections are meritless. All of Plaintiff's requests are relevant. For example, please explain how documents relating to [redacted] are not relevant to her claims or are not reasonably calculated to lead to the discovery of admissible evidence. *See* Request 1. She is entitled to any document related to her. Plaintiff's other requests are also directly relevant to her claims or the Estate's affirmative defenses. She is entitled to discovery, for example, about Epstein's relationship with any employee or associate of Epstein who recruited her (*e.g.*, RFPs 3-4, 11–13, 17-18, 20, 25-29, 31, 33, 37, 41); documents relating to the school from which she was recruited (*e.g.*, RFP 15); Epstein's pattern of using massages to abuse young girls and women (*e.g.*, RFPs 32, 39, 43-45; Interrogatories 5, 8); and Epstein's practice of providing transportation and accommodations to females he abused, including Plaintiff (*e.g.*, RFP 23; Interrogatory 7).

Moreover, Plaintiff is entitled to know the breadth and nature the sex-trafficking operation that she was victimized by. *See* Fed. R. Evid. 415 ("In a civil case involving a claim for relief based on a party's alleged sexual assault or child molestation, the court may admit evidence that the party committed any other sexual assault or child molestation."). Plaintiff alleges that Epstein utilized his sex-trafficking operation to recruit and abuse countless young girls and women in a methodical and similar fashion. Epstein's recruitment, trafficking, and assault of other girls in the same way that he recruited, trafficked, and assaulted Plaintiff would make Plaintiff's allegations more probable. *See* Fed. R. Evid. 401. Plaintiff's discovery requests are therefore directly relevant to the allegations in her Complaint, or, at a minimum, are reasonably calculated to lead to the discovery of admissible evidence.

Third, your objections to certain of the time periods stated in the Requests are meritless for several reasons. As explained above, Epstein's other sexual assaults would be both relevant and admissible in this case, regardless of time period. Further, you have raised a statute of limitations defense in Plaintiff's case, and Plaintiff has made an equitable estoppel argument in response. Plaintiff is entitled to discovery relevant to her equitable estoppel theory, including but not limited to any threats or misrepresentations that Epstein made to Plaintiff to prevent her from filing this lawsuit, outside of the time period during which Plaintiff was physically abused by Epstein.

Fourth, your objection to Plaintiff's definition of Jeffrey Epstein as including "any entities owned or controlled by Jeffrey Epstein, any employee, agent, attorney, consultant, or representative of Jeffrey Epstein" is an improper attempt to narrow your discovery obligations in this matter. Your objection directly contradicts the Local Rules of this Court, which define the word "parties" as including a defendant's "employees, partners, . . . or affiliates." Local Rule 26.3(c)(5). Plaintiff's definition is proper.

Fifth, your responses and objections state many times that certain documents and information are outside of the Estate's possession, custody, and control. If that is the case, please

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explain what is and is not within the Estate's possession and control. For example, please explain in detail what computers, hard drives, email accounts, telephone records, or hard copy documents you have reviewed and provide a list of search terms that were used and specifically list what items you claim to not have access to. We know that Epstein at a minimum used the following email accounts:

- jeffreye@mindspring.com;
- jeeproject@yahoo.com;
- jeevacation@gmail.com;
- jepstein@revonet.com;
- zorroranch@aol.com;
- cecilia@ellmax.com;
- [redacted];
- jeffrey.epstein@centurytel.net; and
- epsteinj@wanadoo.fr

Confirm that you have accessed and searched each of these accounts and provide the protocol used for the search. In the alternative, if the Estate contends that information that is responsive to Plaintiff's discovery requests was destroyed, provide all details relating to the destruction.

Please let us know your availability for a meet and confer on the following dates and times:

- Wednesday, April 22, 2020 between 2:00 and 3:00 EST;
- Thursday, April 23, 2020 between 3:00 EST and 6:00 EST; and
- Friday, April 24, 2020 between 3:00 EST and 5:00 EST.

Sincerely,

/s/ Sigrid S. McCawley
Sigrid S. McCawley

cc: Counsel of Record