

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

\_\_\_\_\_  
Related cases:

08-80232, 08-08380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092  
\_\_\_\_\_

**EPSTEIN'S MOTION FOR PROTECTIVE ORDER AND/OR REQUEST FOR ORDER  
OF CONFIDENTIALITY REGARDING THE PRODUCTION OF THE  
INFORMATION OUTLINED IN THE ORDERS AT DE 462 AND DE 572 AND  
INCORPORATED MEMORANDUM OF LAW**

Defendant, JEFFREY EPSTEIN ("Epstein"), pursuant to Rule 26(c), Federal Rules of Civil Procedure, moves for a protective order and for the entry of an order of confidentiality relative to the information ordered to be produced pursuant to DE 462 and 572, and states:

1. On February 4, 2010, this Court entered an order (DE 462) requiring that Epstein produce his tax returns, passport and certain information provided to him by the federal government during certain criminal proceedings

2. After Motions for Reconsideration and Rule 4 Appeal/Responses were fully briefed, this court entered its order at DE 572 requiring that Jeffrey Epstein produce his tax returns, his passport and the information the federal government gave to Epstein's lawyers during said criminal proceedings. See DEs 462 and 572. The Order requires that Epstein,

through his counsel, comply within 3 days (i.e., by June 30, 2010). As such, this motion must be respectfully addressed before June 30, 2010.

3. As part of that order at DE 572, this court ruled that "...Plaintiff shall not disclose Defendant's tax returns to any third parties without Defendant's consent and/or further court order. . .[and] Plaintiff may disclose this information to an expert witness retained to testify at trial, but only on condition that the expert will agree to retain the confidentiality of the information and not disclose it to any third parties without the agreement of defendant or further order of the Court." The order went on to state that it "...is without prejudice to any future motion by defendant to exclude any of the information produced pursuant to this order at trial."

4. As to the information given to Epstein's lawyers by the federal government as outlined in DE 462, the court did not address in DE 572 any order of confidentiality.

5. As a result of the foregoing, and consistent with DE 572 related to tax returns and passport, Epstein hereby requests that this court enter an order:

- a. limiting Mr. Edwards and Jane Doe's use of the information given to Epstein's lawyers by the federal government only to this litigation;
- b. ordering that the information not be disclosed to any third parties without the consent of the Defendant or further order of this court, which includes news and television media;
- c. requiring, as it did relative to the tax returns and the passport, that any expert that receives the information given to Epstein's lawyers by the federal government must be one retained to testify at trial and shall only receive said information on condition that the expert will agree to retain the confidentiality of the information


and not disclose it to any third parties without the agreement of defendant or further order of the Court;

- d. that the information given to Epstein's lawyers by the federal government be returned to Epstein's lawyers at the conclusion of this trial;
- e. that failure to follow the court's directives set forth in said order shall result in contempt of court; and
- f. for such other and further relief as this court deems just and proper.

WHEREFORE, Defendant, JEFFREY EPSTEIN, requests the Court enter a protective order and confidentiality order incorporating the terms set forth in paragraph 5a-f and grant any additional relief the Court deems just and proper.

**Local Rule 7.1 Statement**

Pursuant to the above rule, the undersigned counsel and Plaintiff's counsel have conferred and were unable to reach an agreement.

/s/ Robert D. Critton, Jr.   
Robert D. Critton, Attorney for  
Defendant Epstein

**Certificate of Service**

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following service list in the manner specified via transmission of Notices of Electronic Filing generated by CM/ECF on this 28 day of June, 2010:

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Respectfully submitted,

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