

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

JANE DOE,

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

Plaintiff,

Vs.

JEFFREY EPSTEIN, et al.

Defendant.

Related Cases:

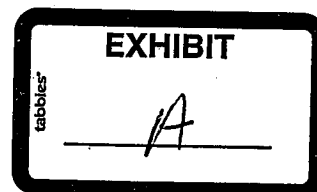
08-80119, 08-80232, 08-80380, 08-80381,  
08-80994, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092

NOTICE OF TAKING DEPOSITION VIDEO DEPOSITION

PLEASE TAKE NOTICE that plaintiff, Jane Doe, will take the video deposition of:

NAME	DATE AND TIME	PLACE OF TAKING DEPOSITON
Story Cowles South Olive Avenue #201S West Palm Beach, FL	May 12, 2010 @ 10:00 AM	US Legal Support 444 West Railroad Avenue Suite 300 West Palm Beach, FL 33401 (561) 835-0220

upon oral examination before US Legal Support, Notary Public, or any other notary public or officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. The depositions are being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Rules of Court.



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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served by e-mail on April 15,  
2010 to: See attached service list.

Bradley J. Edwards  
**Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, PL**  
425 N. Andrews Ave., Suite 2  
Fort Lauderdale, FL 33301  
(954) 524-2820  
(954) 524-2822 fax  
brad@pathtojustice.com

By:



**BRADLEY J. EDWARDS**  
Florida Bar No.: 542075

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

SERVICE LIST

Jane Doe v. Jeffrey Epstein  
United States District Court - Southern District of Florida

Jack Alan Goldberger, Esq.  
[Jgoldberger@agwpa.com](mailto:Jgoldberger@agwpa.com)

Robert D. Critton, Esq.  
[rcritton@bclclaw.com](mailto:rcritton@bclclaw.com)

Isidro Manual Garcia  
[isidrogarcia@bellsouth.net](mailto:isidrogarcia@bellsouth.net)

Jack Patrick Hill  
[iph@searcylaw.com](mailto:iph@searcylaw.com)

Katherine Warthen Ezell  
[KEzell@podhurst.com](mailto:KEzell@podhurst.com)

Michael James Pike  
[MPike@bclclaw.com](mailto:MPike@bclclaw.com)

Paul G. Cassell  
[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

Richard Horace Willits  
[lawyerswillits@aol.com](mailto:lawyerswillits@aol.com)

Robert C. Josefsberg  
[rjosefsberg@podhurst.com](mailto:rjosefsberg@podhurst.com)

Adam D. Horowitz  
[ahorowitz@sexabuseattorney.com](mailto:ahorowitz@sexabuseattorney.com)

Stuart S. Mermelstein  
[ssm@sexabuseattorney.com](mailto:ssm@sexabuseattorney.com)

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JANE DOE	)	
<i>Plaintiff</i>	)	
v.	)	Civil Action No. 08-80893CIV-MARRA/JOHNSO
JEFFREY EPSTEIN	)	
<i>Defendant</i>	)	(If the action is pending in another district, state where:

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Story Cowles, 801 South Olive Avenue, #201S, West Palm Beach, FL 33401

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

Place: US Legal Support 444 West Railroad Avenue, Suite 300 West Palm Beach, FL 33401	Date and Time:  05/12/2010 10:00 am
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Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 04/15/2010

CLERK OF COURT

OR

\_\_\_\_\_  
Signature of Clerk or Deputy Clerk

  
\_\_\_\_\_  
Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) JANE DOE, who issues or requests this subpoena, are:

Bradley Edwards, Esq., Farmer, Jaffe, Weissing, et al., 425 North Andrews Avenue, Suite 2, Ft. Lauderdale, FL 33301 (954) 524-2820, brad@pathtojustice.com

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 08-80893CIV-MARRAJOHNSO

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

This subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)****(c) Protecting a Person Subject to a Subpoena.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

**(d) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(e) Contempt.** The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

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:

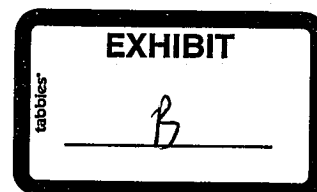
08-80232, 08-08380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092

AFFIDAVIT OF JACK GOLDBERGER, ESQ.

STATE OF FLORIDA )  
COUNTY OF PALM BEACH ) SS

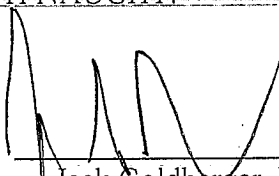
BEFORE ME, the undersigned authority, personally appeared Jack Goldberger, Esq. having personal knowledge and being duly sworn, deposes and says:

1. I, Jack Goldberger, hired Story Cowles on July 16, 2008 and he has worked for me since that time.
2. I hired Mr. Cowles as law office assistant to be directly involved only with Mr. Epstein's case while he was serving his jail sentence at the Palm Beach County Stockade. I employed Mr. Cowles to be, among other things, a conduit for information between the attorneys (criminal and civil) and Mr. Epstein.
3. I have used Mr. Cowles to transmit attorney-client and work product information and documents to Mr. Epstein and other attorneys representing Mr. Epstein with the clear



understating and belief that the communications among Mr. Epstein, his attorneys and staff would be protected by the attorney-client and work product privileges.

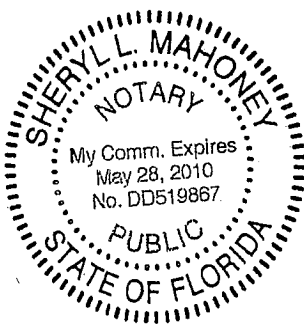
FURTHER THE AFFIANT SAYETH NAUGHT.

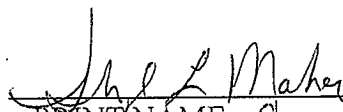
  
\_\_\_\_\_  
Jack Goldberger, Esq.

STATE OF FLORIDA  
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Jack Goldberger known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: Jack Goldberger, and that an oath was/was not taken.

WITNESS my hand and official seal in the County and State last aforesaid this day of April 28, 2010.



  
\_\_\_\_\_  
PRINT NAME: Sheryll Mahoney (SEAL)  
NOTARY PUBLIC/STATE OF FLORIDA  
COMMISSION NO.:  
MY COMMISSION EXPIRES:

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  
\_\_\_\_\_

AFFIDAVIT OF STORY COWLES

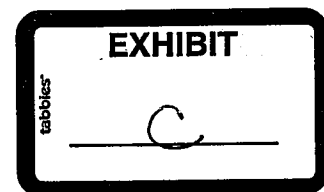
STATE OF FLORIDA                    ) SS  
COUNTY OF PALM BEACH         )

BEFORE ME, the undersigned authority, personally appeared Story Cowles having personal knowledge and being duly sworn, deposes and says:

1. I, Story Cowles, was hired by Jack Goldberger, Esq., July 16, 2008 and have been employed by Mr. Goldberger since that time.

2. I was hired as Mr. Goldberger's law office assistant to be directly involved only with Mr. Epstein's case while he was serving his jail sentence at the Palm Beach County Stockade. I was employed to be, among other things, a conduit for information between the attorneys (criminal and civil) and Mr. Epstein.

3. I did not know, nor have any knowledge of, Mr. Epstein prior to my employment with Mr. Goldberger.




4. I did not know, nor have any knowledge of, Sarah Kellen prior to my employment with Mr. Goldberger.

5. While I have dated and continue to date Ms. Kellen, we specifically have not and do not discuss the facts of the cases against her and Mr. Epstein.

6. Mr. Epstein has never discussed the claims asserted against him with me other than when his attorneys were present or when I transmitted information between Mr. Epstein and his attorneys.

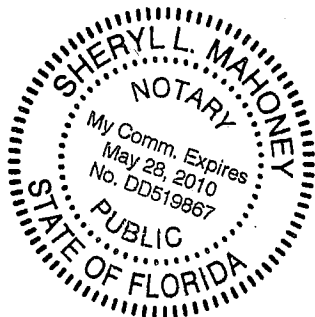
FURTHER THE AFFIANT SAYETH NAUGHT.

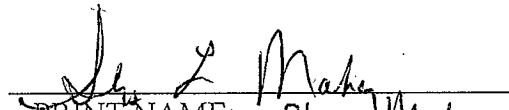
  
Story Cowles

STATE OF FLORIDA  
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Story Cowles known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: Story Cowles, and that an oath was/was not taken.

WITNESS my hand and official seal in the County and State last aforesaid this day of April 29, 2010.



  
PRINT NAME: Sheryl Mahoney (SEAL)  
NOTARY PUBLIC/STATE OF FLORIDA  
COMMISSION NO.:  
MY COMMISSION EXPIRES:

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,  
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AFFIDAVIT OF ROBERT D. CRITTON, JR., ESQ.

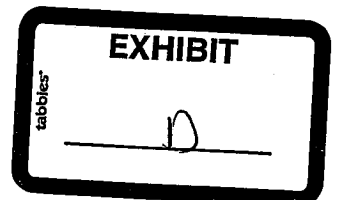
STATE OF FLORIDA ) SS  
COUNTY OF PALM BEACH )

BEFORE ME, the undersigned authority, personally appeared Robert D. Critton, Jr., Esq., having personal knowledge and being duly sworn, deposes and says:

1. I, Robert Critton, and the law firm of Burman, Critton, Luttier & Coleman, LLP represent Mr. Epstein's in the civil cases and claims asserted against him in this and related actions.

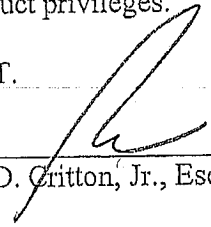
2. It was and is my understanding that Story Cowles has been employed as a legal assistant for Jack Goldberger, Esq. since July 2008.

3. I have used Mr. Cowles to transmit attorney-client and work product information and documents to Mr. Epstein and other attorneys representing Mr. Epstein with the clear



understanding and belief that the communications among Mr. Epstein, his attorneys and staff would be protected by the attorney-client and work product privileges.

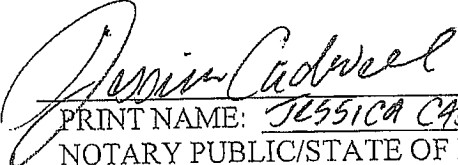
FURTHER THE AFFIANT SAYETH NAUGHT.

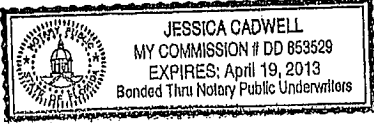
  
\_\_\_\_\_  
Robert D. Critton, Jr., Esq.

STATE OF FLORIDA  
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Robert Critton known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: \_\_\_\_\_, and that an oath was/was not taken.

26<sup>th</sup> day of April, 2010. WITNESS my hand and official seal in the County and State last aforesaid this

  
\_\_\_\_\_  
PRINT NAME: JESSICA CADWELL (SEAL)  
NOTARY PUBLIC/STATE OF FLORIDA  
COMMISSION NO.:  
MY COMMISSION EXPIRES:



**BC  
LC** | BURMAN, CRITTON  
LUTTIER & COLEMAN, LLP  
YOUR TRUSTED ADVOCATES  
A LIMITED LIABILITY PARTNERSHIP

J. MICHAEL BURMAN, PA.<sup>1,2</sup>  
GREGORY W. COLEMAN, P.A.  
ROBERT D. CRITTON, JR., P.A.<sup>1</sup>  
BERNARD LEBEDEKER  
MARK T. LUTTIER, P.A.  
JEFFREY C. PEPIN  
MICHAEL J. PIKE  
HEATHER MCNAMARA RUDA  
DAVID YAREMA

October 7, 2009

ADELOUJI J. BENAVENTE  
PARALEGAL/INVESTIGATOR  
JESSICA CADWELL  
BOBBIE M. MCKENNA  
ASHLIE STOKEN-BARING  
BETTY STOKES  
PARALEGALS  
RITA H. BUDNYK  
OF COUNSEL  
ED RICCI  
SPECIAL CONSUMER  
JUSTICE COUNSEL

<sup>1</sup>FLORIDA BOARD CERTIFIED CIVIL TRIAL LAWYER  
<sup>2</sup>ADMITTED TO PRACTICE IN FLORIDA AND COLORADO

Brad Edwards, Esq.  
Rothstein Rosenfeldt Adler  
401 East Las Olas Boulevard  
Suite 1650  
Fort Lauderdale, FL 33301

RE: Story Cowles

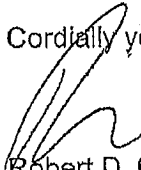
Dear Brad:

I have been out of the office this week moving my home; however, I will be back in the office sometime tomorrow in an attempt to get caught up. In the meantime, I wanted to address your request to depose Story Cowles. Our office will not accept service for Mr. Cowles for the following reasons:

1. Mr. Cowles is a paralegal working under the direction of Jack Goldberger.
2. Any coordination with respect to deposing one of Mr. Goldberger's employees will need to be coordinated with his office.

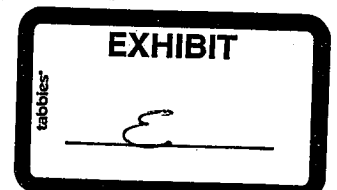
Also, would you please provide me with dates so that I can depose your paralegals??

Cordially yours,

  
Robert D. Critton, Jr.

RDC/jcc

cc: Jack A. Goldberger



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:

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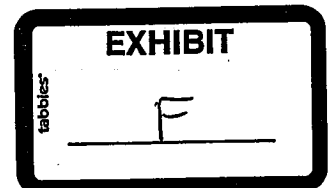
AFFIDAVIT OF MICHAEL J. PIKE, ESQ.

STATE OF FLORIDA ) SS  
COUNTY OF PALM BEACH )

BEFORE ME, the undersigned authority, personally appeared Michael Pike, Esq., having personal knowledge and being duly sworn, deposes and says:

1. I, Michael Pike, am an attorney at the law firm of Burman, Critton, Luttier & Coleman, LLP and represent Mr. Epstein in the civil cases and claims asserted against him in this and related actions.

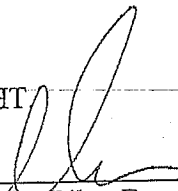
2. In or around October, 2009, I had telephone conferences with Spencer Kuvin, Esq. (counsel for Plaintiff, B.B., in a companion state court case) and Bradley Edwards, Esq. (counsel for Jane Doe and E.W. and L.M., Plaintiffs in companion state court cases), who were seeking to depose Story Cowles.



3. Mr. Kuvin and Mr. Edwards agreed that if Sarah Kellen was produced for deposition, they would not depose Mr. Cowles. Each was attempting to effectuate service of process on Sarah Kellen and also knew that Mr. Cowles is an employee of Jack Goldberger, Esq.

4. Sarah Kellen was produced for deposition and now Mr. Edwards is renegeing on his end of the bargain.

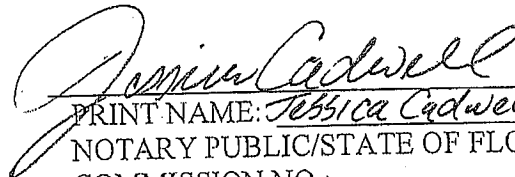
FURTHER THE AFFIANT SAYETH NAUGHT

  
Michael J. Pike, Esq.

STATE OF FLORIDA  
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Michael J. Pike known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: \_\_\_\_\_, and that an oath was/was not taken.

26<sup>TH</sup> day of April, 2010. WITNESS my hand and official seal in the County and State last aforesaid this

  
PRINT NAME: Jessica Cadwell (SEAL)  
NOTARY PUBLIC/STATE OF FLORIDA  
COMMISSION NO.:  
MY COMMISSION EXPIRES:



**Jessica Cadwell**

**From:** Spencer Kuvin [skuvin@leopoldkuvin.com]  
**Sent:** Tuesday, October 13, 2009 11:27 AM  
**To:** Michael J. Pike; Jessica Cadwell; Robert D. Critton Jr.; Connie Zaguirre  
**Subject:** RE: BB

Dont waste your time with a motion. I already told Jack I would move the date. Lets pick another date. Additionally, as I told Jack, if you all will produce Sarah Kellen we dont need to go through with this.

Spencer T. Kuvin  
561-515-1400  
[skuvin@leopoldkuvin.com](mailto:skuvin@leopoldkuvin.com)

**From:** Michael J. Pike [mailto:MPike@bclclaw.com]  
**Sent:** Tuesday, October 13, 2009 11:24 AM  
**To:** Spencer Kuvin; Jessica Cadwell; Robert D. Critton Jr.; Connie Zaguirre  
**Subject:** BB

Spencer:

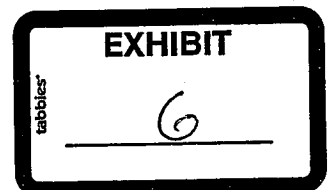
I'm filing a Motion for Protective Order re: Story Cowles' deposition, which you unilaterally set. Please give other dates that you can take this depo and I will check my calendar.

Michael J. Pike, Esq.  
Burman, Critton, Luttier & Coleman  
303 Banyan Boulevard, Ste. 400  
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4/14/2010



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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS, individually,  
and L.M., individually,

Defendant.

ORDER ON DEFENDANT'S MOTION FOR PROTECTIVE ORDER

THIS CAUSE having come before this Court upon Defendant, L.M.'s Motion for Protective Order, and the Court having reviewed the Motion and being fully advised of the premises, it is hereby:

ORDERED AND ADJUDGED, that the Motion is granted  
without prejudice to the Plaintiff to establish  
relevance and discoverability of the information

DONE AND ORDERED at West Palm Beach, Florida, this 19<sup>th</sup> day of April 2010.

  
\_\_\_\_\_  
David F. Crow  
Circuit Court Judge

Copies furnished to:  
Brad Edwards  
Jack Scarola  
Robert Critton, Jr.  
Mark Nurik  
Jack Goldberger

*at special set hearing*

