

EXHIBIT E

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3 JANE DOE NO. 2, CASE NO: 08-CV-80119
4 Plaintiff,
5 Vs.
6 JEFFREY EPSTEIN,
7 Defendant.

8 JANE DOE NO. 3, CASE NO: 08-CV-80232
9 Plaintiff,
10 Vs.

CONDENSED

11 JEFFREY EPSTEIN,
12 Defendant.

13 JANE DOE NO. 4, CASE NO: 08-CV-80380
14 Plaintiff,
15 Vs.

16 JEFFREY EPSTEIN,
17 Defendant.

18 JANE DOE NO. 5, CASE NO: 08-CV-80381
19 Plaintiff,
20 Vs.

21 JEFFREY EPSTEIN,
22 Defendant.

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<p>Page 271</p> <p>1 JANE DOE NO. 6, CASE NO: 08-CV-80994 2 Plaintiff, 3 Vs. 4 JEFFREY EPSTEIN, 5 Defendant.</p> <p>6 JANE DOE NO. 7, CASE NO: 08-CV-80993 7 Plaintiff, 8 Vs. 9 JEFFREY EPSTEIN, 10 Defendant.</p> <p>11 C.M.A., CASE NO: 08-CV-80811 12 Plaintiff, 13 Vs. 14 JEFFREY EPSTEIN, 15 Defendant.</p> <p>16 JANE DOE, CASE NO: 08-CV-80893 17 Plaintiff, 18 Vs. 19 JEFFREY EPSTEIN, 20 Defendant.</p> <p>21 22 23 24 25</p>	<p>Page 273</p> <p>1 IN THE CIRCUIT COURT OF THE 15TH 2 JUDICIAL CIRCUIT IN AND FOR 3 PALM BEACH COUNTY, FLORIDA 4 CASE NO. 502008CA037319XXXXMB AB</p> <p>5 B.B., 6 Plaintiff, 7 Vs. 8 JEFFREY EPSTEIN. 9 Defendant.</p> <p>10 11 12 1031 Ives Dairy Road 13 Suite 228 14 North Miami, Florida 15 August 7, 2009 16 1:15 p.m. to 5:30 p.m.</p> <p>17 CONTINUED 18 VIDEOTAPED 19 DEPOSITION 20 of 21 ALFREDO RODRIGUEZ 22 taken on behalf of the Plaintiffs pursuant 23 to a Re-Notice of Taking Continued Videotaped 24 Deposition (Duces Tecum) 25</p>
<p>Page 272</p> <p>1 JANE DOE NO. II, CASE NO: 08-CV-80469 2 Plaintiff, 3 Vs. 4 JEFFREY EPSTEIN, 5 Defendant.</p> <p>6 JANE DOE NO. 101 CASE NO: 08-CV-80591 7 Plaintiff, 8 Vs. 9 JEFFREY EPSTEIN, 10 Defendant.</p> <p>11 JANE DOE NO. 102, CASE NO: 08-CV-80656 12 Plaintiff, 13 Vs. 14 JEFFREY EPSTEIN, 15 Defendant.</p> <p>16 17 18 19 20 21 22 23 24 25</p>	<p>Page 274</p> <p>1 APPEARANCES: 2 3 MERMELSTEIN & HOROWITZ, P.A. 4 BY: ADAM HOROWITZ, ESQ. 5 18205 Biscayne Boulevard 6 Suite 2218 7 Miami, Florida 33160 8 Attorney for Jane Doe 2, 3, 4, 5, 9 6, and 7.</p> <p>10 ROTHSTEIN ROSENFELDT ADLER 11 BY: BRAD J. EDWARDS, ESQ., and 12 CARA HOLMES, ESQ. 13 Las Olas City Centre 14 Suite 1650 15 401 East Las Olas Boulevard 16 Fort Lauderdale, Florida 33301 17 Attorney for Jane Doe and E.W. 18 And L.M.</p> <p>19 PODHURST ORSECK 20 BY: KATHERINE W. EZELL, ESQ. 21 25 West Flagler Street 22 Suite 800 23 Miami, Florida 33130 24 Attorney for Jane Doe 101 and 102.</p> <p>25 LEOPOLD-KUVIN 26 BY: ADAM J. LANGINO, ESQ. 27 2925 PGA Boulevard 28 Suite 200 29 Palm Beach Gardens, Florida 33410 30 Attorney for B.B.</p>

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<p style="text-align: right;">Page 275</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 RICHARD WILLITS, ESQ.</p> <p>4 2290 10th Avenue North</p> <p>5 Suite 404</p> <p>6 Lake Worth, Florida 33461</p> <p>7 Attorney for C.M.A.</p> <p>8 Appeared via telephone.</p> <p>9</p> <p>10 BURMAN, CRITTON, LUTTIER &</p> <p>11 COLEMAN, LLP</p> <p>12 BY: ROBERT CRITTON, ESQ.</p> <p>13 515 North Flagler Drive</p> <p>14 Suite 400</p> <p>15 West Palm Beach, Florida 33401</p> <p>16 Attorney for Jeffrey Epstein.</p> <p>17</p> <p>18 ALSO PRESENT:</p> <p>19</p> <p>20 JOE LANGSAM, VIDEOGRAPHER</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 277</p> <p>1 Deposition taken before MICHELLE PAYNE, Court</p> <p>2 Reporter and Notary Public in and for the State of</p> <p>3 Florida at Large, in the above cause.</p> <p>4</p> <p>5 THE VIDEOGRAPHER: This is a continuation</p> <p>6 of the deposition of Alfredo Rodriguez.</p> <p>7 Today is Friday, August the 7th, the year</p> <p>8 2009, starting time approximately 1:15 p.m.</p> <p>9 Will the court reporter please swear in</p> <p>10 the witness?</p> <p>11 Thereupon,</p> <p>12 ALFREDO RODRIGUEZ,</p> <p>13 having been first duly sworn or affirmed, was</p> <p>14 examined and testified as follows:</p> <p>15 MR. CRITTON: Before we get started just</p> <p>16 with regard to Ms. Ezell represents Jane Doe</p> <p>17 101 and 102, the alleged time of her</p> <p>18 incidents as of least have been plead in the</p> <p>19 complaint for 101 is '99 -- I'm sorry, '98</p> <p>20 through 2002, with Jane Doe 102 the Spring</p> <p>21 of -- Spring/Summer of 2003. Mr. Rodriguez</p> <p>22 never even began employment until '04 and</p> <p>23 '05. I think her questioning I think -- I</p> <p>24 can't say she doesn't have standing based on</p> <p>25 the court order, but I would say it's</p>
<p style="text-align: right;">Page 276</p> <p>1 CONTINUED INDEX OF EXAMINATION</p> <p>2</p> <p>3 WITNESS DIRECT CROSS REDIRECT RECROSS</p> <p>4 ALFREDO RODRIGUEZ</p> <p>5 (By Ms. Ezell) 278 441, 467</p> <p>6 (By Mr. Willits) 334 453, 469</p> <p>7 (By Mr. Critton) 338 464</p> <p>8 (By Mr. Edwards) 419, 454, 468</p> <p>9 (By Mr. Langino) 452</p> <p>10</p> <p>11 CONTINUED INDEX OF EXHIBITS</p> <p>12 PLAINTIFF'S PAGE</p> <p>13 3 Drawing 315</p> <p>14 4 Photograph 327</p> <p>15 5 Photograph 331</p> <p>16 6 Photograph 331</p> <p>17 7 Photograph 331</p> <p>18 8 Photograph 331</p> <p>19 9 Report 446</p> <p>20 (Exhibits 4, 5, 6, 7, and 8 were retained by Ms.</p> <p>21 Ezell.)</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 278</p> <p>1 completely irrelevant and immaterial and has</p> <p>2 no probative value with regard to this</p> <p>3 particular witness based upon the two</p> <p>4 clients at least that are in suit at this</p> <p>5 point in time.</p> <p>6 MS. EZELL: As Mr. Critton well knows I</p> <p>7 represent a number of other clients whose</p> <p>8 cases have not been filed and I believe we</p> <p>9 do have standing to ask questions, and I do</p> <p>10 intend to do that today.</p> <p>11 EXAMINATION</p> <p>12 BY MS. EZELL:</p> <p>13 Q. Mr. Rodriguez, you stated last time that</p> <p>14 there were guests at the house, frequent guests,</p> <p>15 friends from Harvard.</p> <p>16 Do you remember that testimony?</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. And was there a lawyer from Harvard named</p> <p>19 Alan Dershowitz?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. And are you familiar with the fact that</p> <p>22 he's a famous author and famous lawyer?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. How often during the six months or so</p> <p>25 that you were there was Mr. Dershowitz there?</p>

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<p style="text-align: right;">Page 439</p> <p>1 Q. And you said that that was -- the massage 2 table was similar in kind to that used by Mr. 3 Epstein? 4 A. That's correct. 5 Q. And others had massage oils and that was 6 similar in kind to Mr. Epstein's as well? 7 A. Yes. 8 Q. And you didn't think that the massage 9 table at a home was unusual? 10 A. No. 11 Q. All right. Did any of the other houses 12 where you worked have masseuses that were 14, 15, 13 and 16 years old? 14 MR. CRITTON: Form. 15 THE WITNESS: No, sir. 16 BY MR. EDWARDS: 17 Q. And did any of the other homes where you 18 worked have different girls of that age coming 19 every single day? 20 A. Yes. 21 MR. CRITTON: Form. 22 BY MR. EDWARDS: 23 Q. They had different girls? 24 A. Yes. 25 Q. Okay. And how old were the girls that</p>	<p style="text-align: right;">Page 441</p> <p>1 MR. EDWARDS: I don't have anything else. 2 MS. EZELL: I have a few. 3 EXAMINATION 4 BY MS. EZELL: 5 Q. Mr. Rodriguez, I may have missed 6 something. Did you say that there weren't any 7 wild parties ever at El Brillo Way? 8 A. I never saw what was going on inside the 9 house, Ma'am. 10 Q. So you don't know whether there were or 11 were not? 12 A. No, ma'am. 13 Q. There wasn't just one massage table 14 there; was there? 15 A. We used to have two and we have an extra 16 reserve, I think there were three in the house. 17 Excuse me, I'll take that back. All the bedrooms 18 used to have one. 19 Q. Okay. Thank you. Did you ever hear 20 about a girl named V.R.? 21 A. No, no, ma'am. 22 Q. And those pictures on Ms. Maxwell's 23 computer, did you ever see one of a girl naked in 24 a hammock? 25 MR. CRITTON: Form. Asked and answered.</p>
<p style="text-align: right;">Page 440</p> <p>1 would come to these other homes? 2 A. They seem older. 3 Q. Older than the ones that would come to 4 Mr. Epstein's home? 5 A. Yes. 6 Q. And did you ever work at a place where 7 there would be girls calling up on the phone to 8 say I have girls to bring him and -- 9 A. No, sir. 10 Q. -- coming over in teams -- 11 A. No. 12 Q. -- or pairs? 13 A. No. 14 Q. So there were a lot of things about Mr. 15 Epstein's house and his arrangement that were very 16 unusual compared to the other places where you 17 worked? 18 MR. CRITTON: Form. 19 THE WITNESS: Yes. 20 BY MR. EDWARDS: 21 Q. And there were no drugs and alcohol or no 22 wild parties at Mr. Epstein's house, that is 23 somewhat different from some of the other places 24 where you worked? 25 A. Yes.</p>	<p style="text-align: right;">Page 442</p> <p>1 THE WITNESS: I saw on a book not on a 2 computer. 3 BY MS. EZELL: 4 Q. You saw a picture of a girl naked in a 5 book or on a book? 6 A. The book was done for [REDACTED] and she was 7 on the hammock, that's the only one I saw. 8 Q. I'm sorry, the book was done for [REDACTED] 9 A. She was on the cover. 10 Q. Then there were other people inside the 11 book? 12 A. Yes, ma'am. 13 Q. And in that book there was a picture of a 14 girl naked in a hammock? 15 A. Yes. 16 Q. Where did [REDACTED] keep that book? 17 A. There were a few of those examples but I 18 don't know where she kept it. 19 Q. Was it laying around the house somewhere? 20 A. Yes. 21 Q. Downstairs? 22 A. Downstairs, yes, ma'am. 23 Q. Did Nadia keep scrapbooks or photograph 24 books -- 25 A. Yes.</p>

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<p style="text-align: right;">Page 463</p> <p>1 Q. -- to sexually please Mr. Epstein. 2 Right? 3 MR. CRITTON: Form. 4 THE WITNESS: Yes. 5 BY MR. EDWARDS: 6 Q. I mean, that's what you were telling the 7 police officer. 8 MR. CRITTON: Form. 9 THE WITNESS: Yes. 10 BY MR. EDWARDS: 11 Q. Okay. There's always a different girl at 12 the pool or inside with him when he's here. 13 MR. CRITTON: Form. 14 THE WITNESS: Yes. 15 MS. EZELL: You left out a word, young. 16 BY MR. EDWARDS: 17 Q. Sorry, I'll read the last sentence again. 18 There's always a different young girl at 19 the pool or inside with him when he's here. 20 Do you remember telling the police 21 officer that? 22 A. Yes. 23 MR. CRITTON: Form. 24 BY MR. EDWARDS: 25 Q. And that's true. Right?</p>	<p style="text-align: right;">Page 465</p> <p>1 Q. And as to -- it was read to you by Mr. 2 Edwards and he then asked you a number of 3 questions whether you remembered something. 4 Correct? 5 A. Yes. 6 Q. Okay. Just so I'm clear, he's asking you 7 to speculate on what may or may not have occurred 8 upstairs in the bedroom. I want to be very clear. 9 Mr. Rodriguez, were you ever up in the 10 bedroom to observe whatever went on between a 11 masseuse and Mr. Epstein or anyone else for that 12 matter at any time? 13 MR. HOROWITZ: Form. 14 THE WITNESS: No, sir. 15 BY MR. CRITTON: 16 Q. And so when Mr. Edwards asked you, you 17 were aware that sexual activity or may have been 18 sexual activity occurring upstairs, you have no 19 personal knowledge, you're just speculating; 20 aren't you, sir? 21 MR. HOROWITZ: Form. 22 MR. EDWARDS: Object to the form. 23 THE WITNESS: I never saw them. 24 BY MR. WILLITS: 25 Q. And therefore you can only speculate --</p>
<p style="text-align: right;">Page 464</p> <p>1 A. Yes. 2 Q. When he's at the house there is always a 3 young girl inside with him. 4 MR. CRITTON: Form. 5 BY MR. EDWARDS: 6 Q. Right? 7 A. That's right. 8 Q. Okay. And whether the company line is to 9 call them a masseuse, you knew that these girls 10 were young and were up in the bedroom with Mr. 11 Epstein to sexually please Mr. Epstein. 12 MR. CRITTON: Form. 13 THE WITNESS: That's right. 14 MR. EDWARDS: I don't have anything else. 15 We've already attached this; right? Here is 16 the one that can be attached. 17 MR. WILLITS: Who is next? 18 MR. CRITTON: Me. 19 RE-CROSS EXAMINATION 20 BY MR. CRITTON: 21 Q. Mr. Rodriguez, looking at Exhibit 9 which 22 is the police report that was prepared on November 23 28, 2004, this is the first time you've seen it. 24 Correct? 25 A. That's correct.</p>	<p style="text-align: right;">Page 466</p> <p>1 MR. WILLITS: Object to the form. 2 MR. CRITTON: I need to ask the question 3 first. 4 MR. WILLITS: It was the earlier 5 question. 6 BY MR. CRITTON: 7 Q. All right. If you did not see what was 8 going on you can have no personal knowledge. 9 True? 10 MR. HOROWITZ: Object to the form. 11 MR. EDWARDS: Object to the form. 12 THE WITNESS: Yes. 13 BY MR. CRITTON: 14 Q. And, therefore, what you're doing is 15 speculating or guessing what may have been 16 occurring. True? 17 MR. HOROWITZ: Form. 18 MR. EDWARDS: Form. 19 MR. WILLITS: Form. 20 THE WITNESS: I use my age together. 21 BY MR. CRITTON: 22 Q. I'm not saying that you don't, but 23 without having personal knowledge you're best 24 guessing what may have occurred up there between 25 Mr. Epstein and one of the massage women, or for</p>

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<p style="text-align: right;">Page 467</p> <p>1 that matter anyone else who was upstairs?</p> <p>2 A. Yes.</p> <p>3 MR. HOROWITZ: Form.</p> <p>4 MR. EDWARDS: Form.</p> <p>5 MR. WILLITS: Object to the form.</p> <p>6 MR. CRITTON: Thank you.</p> <p>7 MS. EZELL: I just have a couple of</p> <p>8 questions.</p> <p>9 EXAMINATION</p> <p>10 BY MS. EZELL:</p> <p>11 Q. Following up on that, you did however see</p> <p>12 this same young woman asleep naked in the sauna?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. And you did along with Louella find and</p> <p>15 -- and you did also find sex toys and massagers of</p> <p>16 various kinds and creams scattered around on</p> <p>17 several occasions after these young women had been</p> <p>18 upstairs with Mr. Epstein?</p> <p>19 MR. CRITTON: Object to form, asked and</p> <p>20 answered about six times.</p> <p>21 THE WITNESS: Yes.</p> <p>22 MS. EZELL: No other questions.</p> <p>23 MR. EDWARDS: Sorry, last one. It has</p> <p>24 nothing to do with this report.</p> <p>25 EXAMINATION</p>	<p style="text-align: right;">Page 469</p> <p>1 A. Yes.</p> <p>2 MR. EDWARDS: Nothing else.</p> <p>3 MR. WILLITS: Is it my turn?</p> <p>4 MR. EDWARDS: Yes.</p> <p>5 EXAMINATION</p> <p>6 BY MR. WILLITS:</p> <p>7 Q. Mr. Rodriguez, you mentioned the last</p> <p>8 time about a lady who was an obvious professional</p> <p>9 masseuse by the name of Johanna. Do you remember</p> <p>10 that?</p> <p>11 A. Yes, I do remember.</p> <p>12 Q. Did you ever pay her?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Okay. How much did you pay her?</p> <p>15 A. It was between 200 and 500, sir, but</p> <p>16 somewhere in that -- between those two amounts.</p> <p>17 Q. For Johanna?</p> <p>18 A. Yes, sir.</p> <p>19 MR. WILLITS: Okay. I don't have any</p> <p>20 other questions.</p> <p>21 MR. CRITTON: You have a right to read</p> <p>22 this deposition when the other part is typed</p> <p>23 and make any changes that you want. Would</p> <p>24 you like to do that? It's your right a</p> <p>25 hundred percent. The court reporter can</p>
<p style="text-align: right;">Page 468</p> <p>1 BY MR. EDWARDS:</p> <p>2 Q. During Mr. Critton's questioning he asked</p> <p>3 you about whether or not we had ever shown you a</p> <p>4 previous taped statement that you had given to a</p> <p>5 police officer, and we did not do that; did we?</p> <p>6 A. No.</p> <p>7 Q. We can represent to you that we don't</p> <p>8 have it to show it to you otherwise we would like</p> <p>9 to do that.</p> <p>10 However, he asked you did you tell the</p> <p>11 police officers at that time that the girls</p> <p>12 appeared to be 18 years or older, and I believe</p> <p>13 that you said when you gave the statement to the</p> <p>14 police that you did; right, say that?</p> <p>15 A. Yes.</p> <p>16 Q. And I wrote, I put it in quotes, you said</p> <p>17 that because you were fearful of reprise from</p> <p>18 Ms. Maxwell and Mr. Epstein.</p> <p>19 A. That's correct.</p> <p>20 MR. CRITTON: Form.</p> <p>21 BY MR. EDWARDS:</p> <p>22 Q. Okay. Is everything that you've said</p> <p>23 today and told us today, is it true?</p> <p>24 A. Yes.</p> <p>25 Q. To the best of your knowledge?</p>	<p style="text-align: right;">Page 470</p> <p>1 provide you or whoever set your</p> <p>2 deposition --</p> <p>3 THE WITNESS: I tried to be truthful.</p> <p>4 MR. CRITTON: All you have to do is tell</p> <p>5 her you would like to waive. Do you waive</p> <p>6 the reading and signing?</p> <p>7 MR. EDWARDS: You can either read or you</p> <p>8 can waive reading?</p> <p>9 THE WITNESS: I don't understand what I</p> <p>10 have to do.</p> <p>11 MR. CRITTON: Why don't we go off the</p> <p>12 record and you can explain it to him.</p> <p>13 MR. EDWARDS: We can go off the record.</p> <p>14 THE VIDEOGRAPHER: Off the record.</p> <p>15 (Thereupon, a discussion was held off the</p> <p>16 record.)</p> <p>17 THE WITNESS: Waive.</p> <p>18 (Thereupon, the deposition was concluded</p> <p>19 at 5:30 p.m.)</p> <p>20 - - -</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 THE STATE OF FLORIDA,) 2 COUNTY OF DADE.) 3 4 5 I, the undersigned authority, certify 6 that ALFREDO RODRIGUEZ personally appeared before 7 me on the 7th day of August, 2009 and was duly 8 sworn. 9 10 WITNESS my hand and official seal this 11 18th day of August, 2009. 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>Page 471</p>
<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>CERTIFICATE</p> <p>The State Of Florida,) County Of Dade.)</p> <p>I, MICHELLE PAYNE, Court Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did stenographically report the deposition of ALFREDO RODRIGUEZ; that a review of the transcript was not requested; and that the foregoing pages, numbered from 270 to 472, inclusive, are a true and correct transcription of my stenographic notes of said deposition. I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out. I further certify that I am not an attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.</p> <p>The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.</p> <p>DATED this 18th day of August, 2009.</p> <p>_____ MICHELLE PAYNE, Court Reporter</p>

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