

Exhibit U

Page 2

1 JANE DOE NO. 6, Case No: 08-CV-80994
 2 Plaintiff,
 3 Vs
 4 JEFFREY EPSTEIN,
 5 Defendant.

6 _____/
 7 JANE DOE NO. 7, Case No. 08-CV-80993
 8 Plaintiff,

9 Vs
 10 JEFFREY EPSTEIN,
 11 Defendant.

12 C.M.A., Case No: 08-CV-80811
 13 Plaintiff,

14 Vs
 15 JEFFREY EPSTEIN,
 16 Defendant.

17 _____/
 18 JANE DOE, Case No: 08-CV-80893
 19 Plaintiff,

20 Vs
 21 JEFFREY EPSTEIN,
 22 Defendant.

23 _____/
 24
 25

Page 3

1 JANE DOE NO. II, Case No: 08-CV-80469
 2 Plaintiff,
 3 Vs
 4 JEFFREY EPSTEIN,
 5 Defendant.

6 _____/
 7 JANE DOE NO. 101, Case No: 09-CV-80591
 8 Plaintiff,

9 Vs
 10 JEFFREY EPSTEIN,
 11 Defendant.

12 JANE DOE NO. 102, Case No: 09-CV-80656
 13 Plaintiff,
 14 Vs
 15 JEFFREY EPSTEIN,
 16 Defendant.

17 _____/
 18
 19

20 1031 Ives Dairy Road
 21 Suite 228
 22 North Miami, Florida
 23 July 29, 2009
 24 11:00 a.m. to 5:30 p.m.
 25

Page 4

1 VIDEOTAPED
 2 DEPOSITION
 3 of
 4 ALFREDO RODRIGUEZ
 5
 6 taken on behalf of the Plaintiffs pursuant
 7 to a Re-Notice of Taking Deposition (Duces Tecum)
 8
 9 - - -

10 APPEARANCES:

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 15 Suite 2218
 16 Miami, Florida 33160
 17 Attorney for Jane Doe 2, 3, 4, 5,
 18 6, and 7.

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 20 BY: BRAD J. EDWARDS, ESQ., and
 21 CARA HOLMES, ESQ.
 22 Las Olas City Centre
 23 Suite 1650
 24 401 East Las Olas Boulevard
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 Attorney for Jane Doe and E.W.
 And L.M.

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 10 2290 10th Avenue North
 11 Suite 404
 12 Lake Worth, Florida 33461
 13 Attorney for C.M.A.

14 BURMAN, CRITTON, LUTTIER &
 15 COLEMAN, LLP
 16 BY: ROBERT CRITTON, ESQ.
 17 515 North Flagler Drive
 18 Suite 400
 19 West Palm Beach, Florida 33401
 20 Attorney for Jeffrey Epstein.

21 ALSO PRESENT:

22 JOE LANGSAM, VIDEOGRAPHER
 23
 24 - - -
 25

PL-001506 (2 to 5)

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1 with a copy.
 2 Q. Were you the only one who was allowed to
 3 answer the phone?
 4 A. Yes.
 5 Q. I'm sorry, what would you do --
 6 A. I would leave it on the counter next to
 7 the kitchen so when I find that piece all crumbled
 8 I knew that Mr. Epstein saw the message, so we
 9 communicated like that.
 10 Q. Now, you mentioned Mr. Epstein would give
 11 you instructions during the course of the day.
 12 A. Through his assistant.
 13 Q. And his assistant was whom?
 14 A. Sarah Kellen.
 15 Q. But you didn't view her as your
 16 supervisor?
 17 A. She take orders from Mrs. Maxwell but she
 18 will tell me, Alfredo, we need to buy this, we
 19 need to do this, and so and so was coming. I
 20 couldn't talk directly to Mr. Epstein.
 21 Q. Okay. So any communications from Mr.
 22 Epstein always came through Ms. Kellen?
 23 A. Or from the office in New York. Lesley,
 24 his secretary, or somebody else, the comptroller,
 25 the architect, any lawyer.

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1 Q. Lawyer, what kind of instructions would
 2 you get from lawyers?
 3 A. We used to have a lot of time, for
 4 instance, the dock construction, you need to have
 5 a lot of permits in Palm Beach so they were there
 6 for that reason.
 7 Q. Okay. Now, so you would interact with
 8 the staff from New York and that would include I
 9 think you said Lesley?
 10 A. Lesley, Bella.
 11 Q. What was Lesley's position?
 12 A. Lesley is the secretary, secretary to Mr.
 13 Epstein.
 14 Q. Okay. Is that Lesley Groff?
 15 A. I believe it was, I don't remember the
 16 last name.
 17 Q. Bella, who was Bella?
 18 A. Bella was the assistant comptroller.
 19 Q. Anyone else that you dealt with in New
 20 York?
 21 A. Doug Shadow was the architect and he used
 22 to come to the house in a regular basis because we
 23 used to have a lot of projects going on.
 24 Q. Okay. Would you get advance notice when
 25 Mr. Epstein was going to arrive in Palm Beach?

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1 A. Yes. Sometimes very short notice but,
 2 yes, I was.
 3 Q. So that varied?
 4 A. Yes.
 5 Q. Who would give you that notice?
 6 A. Mrs. Maxwell or Sarah or Larry, the
 7 pilot.
 8 Q. And then you would drive to pick them up
 9 at the airport?
 10 A. Yes.
 11 Q. And who traveled with him?
 12 A. The three pilots and some guests.
 13 Q. What do you mean by guests?
 14 A. He will have some friends from Harvard,
 15 he will have -- well, very important people that,
 16 you know, friends, acquaintances from New York or
 17 Europe because I was just told the number of
 18 people was coming on the plane.
 19 Q. Were there people who were employed by
 20 him who came regularly?
 21 A. Yes.
 22 Q. And who would they be?
 23 A. Like I said, they were the pilots, Larry
 24 Bisosky, George, and I don't remember the flight
 25 engineer, and he will have two girlfriends.

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1 Q. The pilot would have two girlfriends?
 2 A. Mr. Epstein. This is all people coming
 3 in the plane together.
 4 Q. Right. What do you mean by girlfriends?
 5 A. Friends, you know, that he was always
 6 having friends that he will befriend in New York,
 7 I don't know, or some other places.
 8 But I was just told -- my concern was how
 9 many people I have to feed, how many cars do I
 10 need to transport these people from the airport to
 11 the house, and to arrange accommodations in the
 12 house.
 13 Q. What about Sarah Kellen, did she travel
 14 with him?
 15 A. Yes.
 16 Q. So she was on the plane?
 17 A. Yes.
 18 MR. CRITTON: Form.
 19 BY MR. MERMELSTEIN:
 20 Q. And Ms. Maxwell?
 21 MR. CRITTON: Form.
 22 THE WITNESS: No, she will have different
 23 plane.
 24 BY MR. MERMELSTEIN:
 25 Q. Okay.

PB-0015126 to 29)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2, CASE NO: 08-CV-80119

Plaintiff,

Vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 3,

CASE NO: 08-CV-80232

Plaintiff,

Vs.

JEFFREY EPSTEIN,

Defendant.

CONDENSED

JANE DOE NO. 4,

CASE NO: 08-CV-80380

Plaintiff,

Vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5,

CASE NO: 08-CV-80381

Plaintiff,

Vs

JEFFREY EPSTEIN,

Defendant.

PL 001431

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1 JANE DOE NO. 6, CASE NO: 08-CV-80994
 2 Plaintiff,
 3 Vs.
 4 JEFFREY EPSTEIN,
 5 Defendant.

6 JANE DOE NO. 7, CASE NO: 08-CV-80993
 7 Plaintiff,
 8 Vs.

9 JEFFREY EPSTEIN,
 10 Defendant.

11 C.M.A., CASE NO: 08-CV-80811
 12 Plaintiff,
 13 Vs.
 14 JEFFREY EPSTEIN,
 15 Defendant.

16 JANE DOE, CASE NO: 08-CV-80893
 17 Plaintiff,
 18 Vs.

19 JEFFREY EPSTEIN,
 20 Defendant.

21
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 23
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Page 272

1 JANE DOE NO. II, CASE NO: 08-CV-80469
 2 Plaintiff,
 3 Vs.
 4 JEFFREY EPSTEIN,
 5 Defendant.

6 JANE DOE NO. 101 CASE NO: 08-CV-80591
 7 Plaintiff,
 8 Vs.
 9 JEFFREY EPSTEIN,
 10 Defendant.

11 JANE DOE NO. 102, CASE NO: 08-CV-80656
 12 Plaintiff,
 13 Vs.
 14 JEFFREY EPSTEIN,
 15 Defendant.

16
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 18
 19
 20
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 22
 23
 24
 25

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1 IN THE CIRCUIT COURT OF THE 15TH
 2 JUDICIAL CIRCUIT IN AND FOR
 3 PALM BEACH COUNTY, FLORIDA
 4 CASE NO. 502008CA037319XXXMB AB

5 B.B.,

6 Plaintiff,

7 Vs.

8 JEFFREY EPSTEIN.

9 Defendant.

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.

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)
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 Palm Beach Gardens, Florida 33410
 Attorney for B.B.

2(P004321 to 274)

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1 York house?
 2 A. He will have massages.
 3 MR. CRITTON: Form.
 4 BY MR. EDWARDS:
 5 Q. And are we still talking about a habit of
 6 two a day?
 7 MR. CRITTON: Form.
 8 THE WITNESS: I don't know that.
 9 BY MR. EDWARDS:
 10 Q. Okay. So for the time period when you
 11 have been familiar with Mr. Epstein and known his
 12 habits, is it fair to say that he would have
 13 roughly two girls a day in that same age group
 14 wherever he was?
 15 A. Yes.
 16 MR. CRITTON: Form.
 17 BY MR. EDWARDS:
 18 Q. All right. And have you talked to
 19 anybody that has given you similar information
 20 from his Island home?
 21 A. No.
 22 Q. Do you know any of the girls that have
 23 been over to his Island?
 24 A. Yes.
 25 Q. And who are they?

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1 A. Nadia, the girls who used to stay at the
 2 home in El Brillo used to go over there to the
 3 Island.
 4 Q. When he would have these girls -- I guess
 5 we've kind of categorized them as the girls who
 6 would come over with him on an airplane and stay
 7 at the house.
 8 A. Yes.
 9 Q. When they would be staying at the house
 10 would he also have the local Palm Beach girls
 11 coming over that you were told to call masseuses?
 12 A. Yes.
 13 Q. So these girls that came on the airplane
 14 with him, were they also -- did they also have
 15 knowledge that these young girls were coming over
 16 to give massages?
 17 MR. CRITTON: Form.
 18 THE WITNESS: Yes, sir.
 19 BY MR. EDWARDS:
 20 Q. Okay. Who are the girls from the
 21 airplane other than Nadia that you remember?
 22 A. Sarah. There were so many, sir, I don't
 23 recall right now. But Sarah is for sure, Nadia
 24 was one of the main girlfriends, but I don't
 25 remember that.

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1 Q. And is your understanding that Mr.
 2 Epstein was intimate with any of those girls?
 3 MR. CRITTON: Form.
 4 THE WITNESS: Yes.
 5 BY MR. EDWARDS:
 6 Q. With all of them?
 7 MR. CRITTON: Form.
 8 THE WITNESS: Yes.
 9 BY MR. EDWARDS:
 10 Q. With Sarah as well?
 11 A. Yes.
 12 MR. CRITTON: Form.
 13 BY MR. EDWARDS:
 14 Q. With Nadia?
 15 A. Yes.
 16 MR. CRITTON: Form.
 17 BY MR. EDWARDS:
 18 Q. And the girls who would come over on the
 19 airplane?
 20 MR. CRITTON: Form.
 21 THE WITNESS: Yes.
 22 BY MR. EDWARDS:
 23 Q. Did you ever have occasion to go into the
 24 bedroom and find the vibrators or back massagers
 25 out after Mr. Epstein was in the room with any of

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1 the girls that came over on the plane?
 2 MR. CRITTON: Form.
 3 THE WITNESS: Yes.
 4 BY MR. EDWARDS:
 5 Q. So that's something that would be out
 6 after the girls that came over on the plane or the
 7 girls that came over for the massages?
 8 A. Yes.
 9 MR. CRITTON: Form.
 10 BY MR. EDWARDS:
 11 Q. And at the time when you were house
 12 manager you had a 15-year old daughter?
 13 A. Yes.
 14 Q. Did she live down here?
 15 A. In New Jersey.
 16 Q. Okay. When Alan Dershowitz was at the
 17 house I understood you to say that these local
 18 Palm Beach girls would come over to the house
 19 while he was there but you're not sure if he had a
 20 massage from any of those girls.
 21 A. Exactly.
 22 Q. And what would he do while those girls
 23 were at the house?
 24 MR. CRITTON: Form.
 25 THE WITNESS: He will read a book with a

401 (Page 423 to 426)

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1 glass of wine by the pool, stay inside.
 2 BY MR. EDWARDS:
 3 Q. Did he ever talk to any of the girls?
 4 A. I don't know, sir.
 5 Q. Certainly he knew that they were there?
 6 MR. CRITTON: Form.
 7 THE WITNESS: I don't know, sir.
 8 BY MR. EDWARDS:
 9 Q. Do you know how Sarah Kellen knows Mr.
 10 Epstein?
 11 A. No, sir.
 12 Q. Or how long she's known him?
 13 MR. CRITTON: Form.
 14 THE WITNESS: She was on board two years
 15 or a year and a half before I came on board.
 16 BY MR. EDWARDS:
 17 Q. Okay.
 18 A. So it's probably 2003 or 2.
 19 Q. All right. You mentioned this Citrix
 20 system.
 21 A. Yes.
 22 Q. Is that a system that was used to operate
 23 the phones and the computers?
 24 A. The computers mainly.
 25 Q. All right. But you then also described

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1 some system where someone would call on the
 2 telephone and that would be automatically
 3 downloaded to the computer?
 4 A. Yeah, you can retrieve who called in a
 5 transcript written who called, what's the message,
 6 the time so you have it on a piece of paper, you
 7 can print it out.
 8 Q. Is it your understanding that is also
 9 part of the Citrix system?
 10 A. Yes.
 11 Q. All right. Did you have an e-mail?
 12 A. Right now, yes.
 13 Q. No, when you were working at --
 14 A. Yes, I did.
 15 Q. -- Mr. Epstein?
 16 And did Sarah Kellen have an e-mail?
 17 A. Yes.
 18 Q. And did all of the e-mails end the same
 19 way such as Epstein's house dot com or something?
 20 A. Yes.
 21 Q. Okay. What was Sarah Kellen's e-mail?
 22 A. I don't remember.
 23 Q. What was your e-mail?
 24 A. Staff house -- I don't remember, sir.
 25 Q. Do you recall how it ended? I mean

Page 429

1 usually it's Yahoo dot com or at Bellsouth dot
 2 net.
 3 A. It was very uncommon. I don't remember,
 4 sir.
 5 Q. Did everybody in the -- I think you
 6 called it the organization, did everybody have
 7 e-mails?
 8 A. Yes.
 9 Q. Okay. Would that include Nadia?
 10 A. Yes.
 11 Q. All right. And did Mr. Epstein have an
 12 e-mail?
 13 A. Yes.
 14 Q. Did you ever correspond with Mr. Epstein
 15 by e-mail?
 16 A. Yes.
 17 MR. EDWARDS: You can go ahead.
 18 THE WITNESS: That's the only one that I
 19 remember.
 20 THE VIDEOGRAPHER: Okay, we're off the
 21 record.
 22 (Thereupon, a recess was had.)
 23 THE VIDEOGRAPHER: We're back on the
 24 record with tape number four.
 25 BY MR. EDWARDS:

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1 Q. Mr. Rodriguez, what was Mr. Epstein's
 2 e-mail?
 3 A. Jeep project at something -- Jeep
 4 project -- I can't remember it right now.
 5 Q. Okay. In the course of this next 10 or
 6 15 minutes --
 7 A. I can recall.
 8 Q. -- if it comes to you just tell me. So
 9 it was Jeep project --
 10 A. Like Jeep, the brand name Jeep, Jeep
 11 project at -- I can't remember.
 12 Q. Okay. Was that his only e-mail to your
 13 knowledge?
 14 A. No.
 15 Q. He had other e-mail addresses?
 16 A. Yes.
 17 Q. Do you know what any of his other e-mail
 18 addresses were?
 19 A. No, I don't remember.
 20 Q. Do you know who the carriers were for the
 21 other e-mail addresses owned by Jeffrey Epstein?
 22 A. No, sir.
 23 Q. Whether it was Yahoo or hot mail or --
 24 A. No, none of those.
 25 Q. Okay. Was this Jeep project e-mail run

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