

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL
CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and PAUL G.
CASSELL,,

Plaintiffs,

vs.

ALAN M. DERSHOWITZ,

Defendant.

_____ /

VIDEOTAPE DEPOSITION OF

ALAN M. DERSHOWITZ

VOLUME 1

Pages 1 through 179

Thursday, October 15, 2015
9:31 a.m. - 4:13 p.m.

Cole Scott & Kissane
110 Southeast 6th Street
Fort Lauderdale, Florida

Stenographically Reported By:
Kimberly Fontalvo, RPR, CLR
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1 Thereupon,
2 the following proceedings began at 9:31 a.m.:
3 VIDEOGRAPHER: This is the 15th day of 09:31:40
4 October, 2015. The time is approximately 9:31
5 a.m. This is the videotaped deposition of Alan
6 M. Dershowitz in the matter of Bradley J.
7 Edwards and Paul Cassell versus Alan M.
8 Dershowitz. This deposition is being held at
9 110 Southeast 6th Street, Suite 1850, Fort
10 Lauderdale, Florida, 33301.
11 My name is Travis Gallagher. I'm the 09:31:40
12 videographer representing Above & Beyond
13 Reprographics.
14 Will the attorneys please announce their 09:31:46
15 appearances for the record.
16 MR. SCAROLA: My name is Jack Scarola. 09:31:48
17 I'm counsel on behalf of Bradley Edwards and
18 Professor Paul Cassell. Mr. Edwards and
19 Mr. Cassell are also present.
20 Also with us from the Utah Attorney 09:31:58
21 General's office is Joni Jones.
22 MS. McCAWLEY: Sigrid McCawley. I'm with 09:32:06
23 the law firm of Boies Schiller & Flexner on
24 behalf of Virginia Roberts-Gray.
25 MR. SCOTT: Good morning. Tom Scott on 09:32:12

6

1 behalf of the Defendant Professor Dershowitz.

2 MR. SIMPSON: Richard Simpson on behalf of 09:32:18

3 Professor Dershowitz.

4 MR. SWEDER: Ken Sweder on behalf of 09:32:22

5 Defendant and Counterclaimant Alan M.

6 Dershowitz.

7 MR. WEINBERG: This is Martin Weinberg 09:32:29

8 appearing by telephone. Thank you for allowing

9 that on behalf of Jeffrey Epstein.

10 MR. SAFRA: This is Steven Safra also on 09:32:37

11 behalf of Professor Dershowitz.

12 MR. INDYKE: This is Darren Indyke on 09:32:43

13 behalf of Jeffrey Epstein.

14 MS. RICHARDSON: Nicole Richardson on 09:32:46

15 behalf of Professor Dershowitz.

16 Thereupon: 09:32:47

17 ALAN DERSHOWITZ 09:32:47

18 having been first duly sworn, was examined and 09:32:47

19 testified as follows:

20 DIRECT EXAMINATION 09:32:47

21 BY MR. SCAROLA: 09:32:54

22 **Q. Would you please state your full name, 09:32:55**

23 **sir?**

24 A. Alan Morton Dershowitz. 09:32:57

25 **Q. And where did you live? 09:32:59**

7

1 A. Well, I live in three places. We have a 09:33:00

2 home in Miami Beach, a small condo apartment where

3 we spend the winters. We live in the fall and part

4 of the spring in an apartment in New York, and then

5 we have a summer place on Martha's Vineyard.

6 **Q. Within the last ten years, have you had 09:33:21**

7 **other residence besides those that you've described?**

8 A. Yes. 09:33:27

9 **Q. And where are they? 09:33:27**

10 A. We owned a home in Cambridge, 09:33:30

11 Massachusetts about a mile away from the Harvard Law

12 School.

13 **Q. And at what point in time did you no 09:33:39**

14 **longer have the Cambridge home?**

15 A. Well, we moved out of it a couple of years 09:33:45

16 ago and then it was on the market for a while. And

17 then it was sold. I don't have exact dates in my

18 mind.

19 **Q. Sometime within the last three years 09:33:57**

20 **approximately?**

21 A. Certainly was sold within the last three 09:34:02

22 years, yes.

23 **Q. And you moved out when? 09:34:04**

24 A. Moved out earlier than that. Moved out 09:34:06

25 when we put it on the market. And when I came back

8

1 to teach at Harvard for my last semester, we stayed

2 in the Charles Hotel.

3 **Q. How long have you had the apartment in 09:34:20**

4 **New York?**

5 A. This apartment, it's been a couple of 09:34:23

6 years.

7 **Q. And prior to that, was there a period of 09:34:26**

8 **time when you maintained another residence in**

9 **New York?**

10 A. Yes. 09:34:31

11 **Q. And what period of time was that? 09:34:32**

12 A. Probably 30 years, around 30 years. 09:34:37

13 **Q. Beginning approximately 30 years ago? 09:34:42**

14 A. Yes, beginning approximately 30 years ago, 09:34:46

15 yes.

16 **Q. So, have you maintained a residence in 09:34:49**

17 **New York continuously for approximately the last**

18 **30 years?**

19 A. We have not maintained a residence as that 09:34:56

20 term's legally applied. We have had a pied-à-terre

21 in New York that we occasionally visited over the

22 past 30 years, yes.

23 **Q. You had property where you could stay 09:35:07**

24 **overnight, you had access to that property in**

25 **New York continuously for the past 30 years?**

9

1 A. That's correct. 09:35:20

2 **Q. Is that accurate? 09:35:21**

3 A. That's correct, yes. 09:35:22

4 **Q. All right. Can you tell me, please, 09:35:23**

5 **whether you agree or disagree with the following**

6 **statement: "According to our philosophical and**

7 **ethical traditions, reputation is sacrosanct"?**

8 MR. SCOTT: Can I ask what you're 09:35:39

9 publishing from?

10 MR. SCAROLA: I'm just asking a question. 09:35:41

11 A. I believe reputation is sacrosanct and I 09:35:43

12 believe that an effort has been made to destroy mine

13 by false and malicious charges, yes.

14 MR. SCAROLA: I would move to strike the 09:35:53

15 unresponsive portion of the answer.

16 BY MR. SCAROLA: 09:35:56

17 **Q. Do you agree or disagree with the 09:35:56**

18 **following: "A good name is more desirable than**

19 **great riches"?**

20 A. I certainly agree with that. And there's 09:36:02

21 been an effort to destroy my good name by false and

22 mendacious charges.

23 MR. SCAROLA: I move to strike the 09:36:09

24 unresponsive portion of the answer.

25

10

1 BY MR. SCAROLA: 09:36:12

2 **Q. Do you agree or disagree with the 09:36:13**

3 **following statement: "While throughout history**

4 **reputation has been recognized as a priceless**

5 **treasure, it is fragile"?**

6 A. I think that the longer one maintains a 09:36:28

7 good reputation, as I have for over 50 years, the

8 less fragile it is; but, yes, it is fragile and one

9 false allegation maliciously made by a serial liar

10 with the help of her unethical lawyers could destroy

11 a fragile or hurt a fragile reputation.

12 MR. SCAROLA: Move to strike the 09:36:59

13 unresponsive portion of the answer.

14 MR. SCOTT: Obviously we take a different 09:37:01

15 position. But go ahead, Jack.

16 BY MR. SCAROLA: 09:37:04

17 **Q. Do you agree or disagree with the 09:37:05**

18 **following statement: "Sensational accusations, even**

19 **when baseless, often cause damage that is**

20 **irreversible"?**

21 A. That is a perfect description of exactly 09:37:15

22 what happened to me, yes, at the hands of your

23 clients.

24 MR. SCAROLA: Move to strike the 09:37:24

25 unresponsive portion of the answer.

11

1 BY MR. SCAROLA: 09:37:26

2 **Q. Do you agree or disagree with the 09:37:27**

3 **following statement: "There is no presumption of**

4 **innocence in the court of public opinion"?**

5 A. I think there's some truth to that. But 09:37:35

6 when you have a good reputation, there are some who

7 do presume innocence, particularly when the charges

8 made against you are so clearly filled with the lies

9 and financial motivation as were in the instance

10 when your clients directed false accusations against

11 me.

12 MR. SCAROLA: Move to strike the 09:38:06

13 unresponsive portion of the answer.

14 BY MR. SCAROLA: 09:38:08

15 **Q. Do you agree or disagree with the 09:38:09**

16 **following statement: "The usual reaction to ugly**

17 **accusations assumes that fire lies beneath the**

18 **smoke, rather than that the smoke lies"?**

19 MR. SCOTT: You want that read back? You 09:38:25

20 got it all?

21 A. Can you -- can you show me where that 09:38:31

22 comes from?

23 09:38:34

24 BY MR. SCAROLA: 09:38:34

25 **Q. I'm only asking ultimately whether you 09:38:35**

12

1 **agree or disagree with the statement.**

2 MR. SCOTT: It's our position that you're 09:38:38

3 reading from something that -- especially if

4 you're reading something that he's published,

5 he has the option to see it in order to -- if

6 you're quoting from it, we would like to ask

7 you to produce it so he can read it.

8 A. It's -- it's a metaphorical statement 09:38:53

9 whose general thrust I agree with, yes.

10 BY MR. SCAROLA: 09:38:58

11 **Q. Thank you. 09:38:59**

12 A. Thank you very much for reading from my -- 09:39:01

13 from my book. Appreciate it.

14 **Q. In light of your agreement with the 09:39:10**

15 **principles that I have just read, can we also agree**

16 **that a serious injury to a reputation requires**

17 **serious monetary compensation if the injury is**

18 **unjustified?**

19 MR. SCOTT: Objection, form, conclusion, 09:39:28

20 speculation.

21 A. I don't think that there is any possible 09:39:32

22 monetary compensation for the attempt to damage my

23 reputation which your clients have maliciously and

24 deliberately set out to do for their own financial

25 reasons.

13

1 09:39:47

2 BY MR. SCAROLA: 09:39:47

3 **Q. That, however, is not a response to the 09:39:47**

4 **question that I asked. So let me try again.**

5 MR. SCAROLA: And I move to strike that. 09:39:50

6 BY MR. SCAROLA: 09:39:52

7 **Q. Can we agree that in light of the 09:39:53**

8 **statements that you have recognized to be accurate**

9 **regarding the priceless value of reputation, that an**

10 **unjustified injury to reputation is a serious injury**

11 **that requires serious compensation?**

12 MR. SCOTT: Same objection. 09:40:17

13 A. I don't think that question can be 09:40:18

14 answered in a yes or no way. I will just reiterate

15 that I think the damage to my reputation exceeds any

16 possible amount of money. If I had been offered

17 \$10 million in exchange for somebody making the

18 kinds of baseless accusations that your clients made

19 against me, I would have turned down that

20 \$10 million. I think that there is no compensation

21 possible other than a complete apology and

22 withdrawal of the false accusations, especially

23 since your clients know that the accusations made

24 against me are baseless and false.

25

14

1 BY MR. SCAROLA: 09:41:02

2 **Q. Do you agree that if an injury to 09:41:03**

3 **reputation is done purposefully and with malice, it**

4 **is deserving of punishment?**

5 MR. SCOTT: Objection, legal conclusion, 09:41:13

6 form, speculation.

7 A. I believe that the accusations leveled 09:41:18

8 against me were made with malice and with deliberate

9 intention, which is why I am going to be seeking

10 disciplinary action, including disbarment, against

11 your unethical and mendacious clients.

12 MR. SCAROLA: Move to strike as 09:41:36

13 unresponsive to my question.

14 BY MR. SCAROLA: 09:41:38

15 **Q. The question I'm posing to you, sir, is: 09:41:39**

16 **Do you agree that if an injury to reputation is done**

17 **without factual basis and intentionally, it is**

18 **deserving of punishment?**

19 A. What you have done is to describe with 09:41:58

20 great precision what your clients did to me. And so

21 the answer to my question is -- the answer to your

22 question is yes, I think your -- I think your

23 clients are deserving of punishment, yes.

24 **Q. Do you believe that you are a special 09:42:09**

25 **case; that is, that intentional injury to your**

15

1 **reputation is deserving of punishment but**

2 **intentional injury to the reputation of others is**

3 **not deserving of punishment?**

4 MR. SCOTT: Objection, form, 09:42:24

5 argumentative, compound.

6 A. I certainly don't think I'm a special 09:42:26

7 case. I think that I have been defamed and

8 deliberately by your clients and I don't think

9 lawyers who engage in such deliberate conduct should

10 be allowed to practice law, which is why I am going

11 to seek their -- their -- their disbarment and

12 other -- other sanctions.

13 BY MR. SCAROLA: 09:42:49

14 **Q. In fact, you have been making public 09:42:50**

15 **statements of your intention to seek the disbarment**

16 **of Bradley Edwards and Paul Cassell for**

17 **approximately ten months, correct?**

18 A. That's right. That's correct. 09:43:03

19 **Q. You are aware of the ethical obligation 09:43:05**

20 **that a lawyer has when that lawyer has direct**

21 **knowledge of unethical conduct on the part of**

22 **another member of the Bar --**

23 A. That's right. 09:43:16

24 **Q. -- to report that unethical conduct, 09:43:16**

25 **correct?**

16

1 A. Yes. 09:43:19

2 **Q. Have you done that? 09:43:20**

3 A. I have conferred with three leading ethics 09:43:21

4 experts and I have been advised that to file a

5 report while there is ongoing litigation is not the

6 proper approach. But rather to gather the evidence

7 and the information and to make sure that all of the

8 allegations I make are well founded, unlike what

9 your clients did, and then at the appropriate time,

10 when the litigation is concluded, seek the

11 disbarment of Bar associations. I am advised by my

12 ethics experts do not look kindly on attempts to

13 disbar lawyers that can be perceived as part of an

14 ongoing litigation strategy.

15 I fully intend to seek disbarment, as I 09:44:10

16 said, of your clients because I believe they engaged

17 in unprofessional, unethical and disbarable

18 conduct. And I've continued to do so until as

19 recently as last week.

20 MR. SCAROLA: Move to strike the 09:44:28

21 unresponsive portion of that answer.

22 BY MR. SCAROLA: 09:44:32

23 **Q. Who are the three leading experts with 09:44:33**

24 **whom you've conferred?**

25 A. The expert I conferred with initially was 09:44:37

17

1 Dean Monroe Freedman of the Hofstra law school who

2 had been my kind of ethical guru for my entire

3 career. I spent an extensive amount of time with

4 him conferring about all aspects of this case.

5 I then conferred with Professor Stephen 09:44:59

6 Gillers, who is wildly regarded as the leading

7 current ethics expert in the United States who is a

8 professor at NYU law school.

9 I also conferred with Professor Ronald 09:45:12

10 Rotunda, and in the process of also received advice,

11 some unsolicited -- some solicited from a variety of

12 lawyers and other experts. I'll give you an

13 example.

14 For example, when I was speaking at an 09:45:33

15 event in Florida, a man came over to me who I -- I

16 don't recall his name, but he worked for a big firm

17 and was on the -- on some ethics committee of a

18 Florida Bar Association. And he advised me to bring

19 ethics charges saying that from what he had seen,

20 the conduct of the lawyers were unethical and

21 unprofessional and deserved disbarment. But also

22 advised me not to do it until litigation was

23 concluded.

24 MR. SCAROLA: Move to strike the 09:46:07

25 unresponsive portions of that answer.

18

1 And I would ask, Mr. Scott, that you 09:46:10
 2 counsel your client to be responsive to the
 3 questions in order that we have some reasonable
 4 expectation of being able to finish this
 5 deposition within my lifetime.
 6 MR. SCOTT: I'm not here to exchange 09:46:26
 7 sarcastic comments, Jack, with you. I believe
 8 my client is trying to answer your questions.
 9 MR. SCAROLA: The question asked for names 09:46:32
 10 of three individuals. What I got was a speech.
 11 What I have gotten repeatedly in response to
 12 direct questions are speeches. I would ask
 13 that you counsel your client to please respond
 14 to the questions.
 15 MR. SCOTT: When we take a break, I'll 09:46:45
 16 speak to my client in general based upon what I
 17 think is appropriate. Let's proceed.
 18 MR. SCAROLA: Thank you. 09:46:54
 19 BY MR. SCAROLA: 09:46:54
 20 **Q. In an interview with Hala Gorani on 09:46:55**
 21 **January 5 of this year, broadcast on CNN Live, you**
 22 **said, "I have a superb memory."**
 23 **Do you acknowledge having made that 09:47:08**
 24 **statement?**
 25 A. I have a superb memory, so I must have 09:47:10

19

1 made that statement. My mother had an extraordinary
 2 memory and when I was in college and I was on the
 3 debate team, my mother allowed me to debate on the
 4 Sabbath, which was Jewish rest day, only on the
 5 condition that I not take notes or write. And at
 6 that point I discovered that I have a very good
 7 memory and don't have to -- generally didn't have to
 8 take notes.
 9 My memory, obviously, at the age of 77 has 09:47:41
 10 slipped a bit; but do I have a very good memory,
 11 yes.
 12 MR. SCAROLA: Move to strike the 09:47:48
 13 unresponsive portions of the answer.
 14 Would you like to take a break now, 09:47:51
 15 Mr. Scott, so that --
 16 MR. SCOTT: No, I'd like to proceed. 09:47:55
 17 MR. SCAROLA: Okay. 09:47:56
 18 A. Me too. 09:47:57
 19 BY MR. SCAROLA: 09:47:58
 20 **Q. So it is your contention that you still 09:47:58**
 21 **have a superb memory?**
 22 A. No. My contention is that I have a very 09:48:00
 23 good memory and that at the age of 77, occasionally
 24 my memory slips. I particularly have difficult time
 25 now remembering names of people I've just met, but I

20

1 remember events very well. And when I argue cases
 2 in front of courts, I generally don't need to have
 3 notes in front of me because I remember the cases
 4 very well. And I remember the transcript very well,
 5 and so I have always relied on my good memory in my
 6 professional life.
 7 **Q. So, on January 5, when you were 09:48:29**
 8 **interviewed on CNN Live, your memory at that time**
 9 **was superb but in the ensuing ten months, it has**
 10 **become less than superb?**
 11 A. No -- 09:48:41
 12 MR. SCOTT: Objection, form. 09:48:41
 13 BY MR. SCAROLA: 09:48:42
 14 **Q. Is that correct? 09:48:42**
 15 A. No, that's not correct. 09:48:42
 16 MR. SCOTT: Let me -- objection, form, 09:48:44
 17 conclusion, not what he said.
 18 A. Memory is a matter of degree and memories 09:48:48
 19 don't -- unless there's an illness or trauma,
 20 don't -- don't suddenly change. I've had no --
 21 nothing in my life to dramatically change. But as I
 22 said, as a 77-year-old, my memory is not what it was
 23 when I was a 25-year-old.
 24 BY MR. SCAROLA: 09:49:11
 25 **Q. Are you under the influence today of any 09:49:11**

21

1 **drugs or alcohol that might have an affect on your**
 2 **memory?**
 3 A. No. 09:49:18
 4 **Q. Are you having any physical problems that 09:49:19**
 5 **might make it difficult for you to understand or**
 6 **properly respond to my questions?**
 7 A. No. 09:49:24
 8 **Q. Did you get a good night's sleep last 09:49:25**
 9 **night?**
 10 A. Yes. 09:49:28
 11 **Q. What is the general condition of your 09:49:28**
 12 **health?**
 13 A. As a result of some of the tensions caused 09:49:31
 14 by these false accusations, I've had a recurrence of
 15 my atrial fibrillation and a recurrence of some
 16 experiences of high blood pressure. But beyond
 17 that, my general health is satisfactory.
 18 **Q. Has any healthcare provider attributed the 09:49:58**
 19 **recurrence of your atrial fibrillation to**
 20 **involvement in the circumstances that gave rise to**
 21 **this litigation?**
 22 A. My cardiologist asked me whether or not 09:50:15
 23 there were any tense or tension-causing episodes
 24 recently that might explain my recurrence of the
 25 atrial fibrillation. And in response I did describe

22

1 the current false accusations against me in an
 2 attempt to destroy my reputation by false and
 3 malicious charges, yes.

4 **Q. What is the name of your cardiologist?** 09:50:39

5 A. Jeremy Ruskin, R-U-S-K-I-N. He's the 09:50:41
 6 chief of electro cardio physiology at Massachusetts
 7 General Hospital.

8 **Q. Has any healthcare provider attributed 09:50:53**
 9 **your high blood pressure to events that are the**
 10 **subject of this litigation?**

11 A. Again, when I complained about high blood 09:51:01
 12 pressure, one of the first questions that I'm asked
 13 is whether or not there's any tension or any tense
 14 experiences occurring in my life and the doctor
 15 who's treated me for high blood pressure is
 16 Dr. Harold Solomon, S-O-L-O-M-O-N, in Brookline,
 17 Massachusetts.

18 **Q. Has Dr. Solomon -- 09:51:24**

19 A. Right. 09:51:27

20 **Q. -- attributed your high blood pressure to 09:51:27**
 21 **events related to this litigation?**

22 A. I think all of my doctors have 09:51:34
 23 concluded -- you'll have to ask them -- that this
 24 lawsuit has been a contributing factor to some of
 25 the health issues -- let me withdraw that. That the

23

1 false accusations against me from your client have
 2 contributed to some of my health problems, yes.

3 **Q. When did your atrial fibrillation recur?** 09:52:00

4 A. About a month ago. About a month ago. 09:52:07
 5 I -- I could get you the exact date because I keep a
 6 record with a small cardiogram of my afib pretty
 7 much every day.

8 **Q. When did your blood pressure increase as a 09:52:23**
 9 **result of events related to this litigation?**

10 A. Well, it's been up and down. I've had 09:52:31
 11 recurring episodes of high blood pressure. And I
 12 think particularly since the beginning of the false
 13 charges, not the litigation, but it's the false
 14 charges, the outrageous allegations, baseless
 15 outrageous allegations against me have certainly
 16 contributed in my view to my variation in blood
 17 pressure, yes.

18 **Q. When were you initially diagnosed with 09:53:07**
 19 **atrial fibrillation?**

20 A. About two and a half years ago I had -- 09:53:17
 21 let's see, December -- two and a half years ago
 22 December I was admitted to Mount Sinai Hospital with
 23 an episode. It then basically went away. And then
 24 it returned as atrial flutter.
 25 And then I had an ablation, which cured or 09:53:48

24

1 relieved any symptoms of atrial fibrillation or
 2 atrial flutter, until they recurred -- until it
 3 recurred about a month or maybe it's a month and a
 4 half now. I can give you the exact dates. Because,
 5 as I say, I have it on my -- on my machine.

6 **Q. When did the atrial flutter occur?** 09:54:16

7 A. I told you that I don't have the exact 09:54:20
 8 date, but it occurred about a month, month and a
 9 half ago, I think sometime in August of this year.
 10 But I can give you the exact date. As I said, I
 11 have it on my machine.

12 **Q. So, what you have described as a 09:54:33**
 13 **recurrence of atrial fibrillation you are now**
 14 **describing as an atrial flutter?**

15 A. You're confused, sir. Please listen to my 09:54:42
 16 answers. What I've said was that I had atrial
 17 flutter. Atrial flutter occurred after my initial
 18 atrial fib. I then had an ablation. The flutter
 19 and the fib both disappeared after the ablation.
 20 And my atrial fib has returned.

21 **Q. Given your superb memory, would you please 09:55:13**
 22 **name for us each of the lawyers who has represented**
 23 **you in this case?**

24 MR. SCOTT: Objection, form. 09:55:22
 25 Argumentative.

25

1 If you need a document or anything to 09:55:29
 2 refresh your memory, please let us know.

3 A. Well, I'll start with the names of my 09:55:34
 4 lawyers. I've been represented by Judge Scott and
 5 his law firm, including several associates and
 6 paralegals. I don't know their status, whether
 7 they're partners, associates or paralegals, but I've
 8 had contact with them.

9 I have been represented by Mr. Simpson's 09:55:54
 10 law firm, including several partners, associates,
 11 and paralegals. I've been represented by Kenneth
 12 Sweder and presumably some of his partners and
 13 associates.

14 I've been represented by Kendall Coffey 09:56:15
 15 and several of his associates and partners. I would
 16 say those are my main lawyers. But I've also had
 17 others.

18 I have sought the legal advice of Mark 09:56:34
 19 Fabiani, who was my former research assistant at
 20 Harvard. I've sought the advice of Mitchell Webber,
 21 who was my former research assistant at Harvard.

22 I was offered legal advice by Carlos 09:56:52
 23 Sires, who was -- who is a partner in the Boise firm
 24 who -- who volunteered to represent me along with
 25 one of his partners, but then withdraw from the

26

1 representation when he discovered that I had a
 2 conflict of interest.
 3 I've had consultations with a variety of 09:57:18
 4 other lawyers over particular issues in the case,
 5 Floyd Abrams, who is probably the leading lawyer in
 6 the world on First Amendment, has advised me on my
 7 First Amendment rights to have said what I said
 8 truthfully and expressed my opinion about your
 9 clients.
 10 I mean, that's the very beginning. But 09:57:51
 11 when the events first occurred, I got calls from
 12 dozens of lawyers outraged by the unethical conduct
 13 of your clients and offering to represent me
 14 pro bono, offering to do anything they could to see
 15 that these lawyers were appropriately punished and
 16 disciplined.
 17 David Markus, for example, of the Miami 09:58:17
 18 Bar called and keeps calling asking if there's
 19 anything he can do to help me.
 20 There's a lawyer in Broward named Diner, 09:58:28
 21 who has offered to represent me. It goes on and on
 22 and on. The offers are still coming in. People are
 23 just absolutely outraged by the unprofessional and
 24 unethical conduct of your clients and are offering
 25 to help me right a wrong and undo an injustice.

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1 MR. SCOTT: Just hold it. Somebody's 09:59:00
 2 making noise on the phone and it's causing a
 3 little disruption here. So, you know, I'm not
 4 sure who it is, one of you-all on the phone.
 5 Thanks.
 6 BY MR. SCAROLA: 09:59:16
 7 **Q. Mr. Scott is obviously still representing 09:59:21**
 8 **you now; is that correct?**
 9 A. That's correct. 09:59:24
 10 **Q. Richard Simpson is still representing you 09:59:25**
 11 **now; is that correct?**
 12 A. That's correct. 09:59:27
 13 **Q. Ken Sweder is representing you now; is 09:59:28**
 14 **that correct?**
 15 A. That's correct, yes. 09:59:30
 16 **Q. Is Kendall Coffey representing you now? 09:59:30**
 17 A. Yes. 09:59:33
 18 **Q. Is Mark Fabiani representing you now? 09:59:35**
 19 A. Yes. 09:59:37
 20 **Q. And when I ask "are they representing you 09:59:38**
 21 **now," they're representing you now in this**
 22 **litigation; is that correct?**
 23 MR. SCOTT: I don't think that -- 09:59:45
 24 objection, form. I don't think that was
 25 specified.

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1 MR. SCAROLA: Well, that's why I'm asking. 09:59:48
 2 MR. SCOTT: As opposed to general advice. 09:59:50
 3 A. Yes. Yes. 09:59:52
 4 BY MR. SCAROLA: 09:59:53
 5 **Q. And Mark Fabiani is representing you with 09:59:53**
 6 **regard to this litigation; is that correct?**
 7 A. Yes, yes. 09:59:57
 8 **Q. Floyd Abrams is representing you now with 09:59:58**
 9 **regard to this litigation; is that correct?**
 10 A. Yes. 10:00:01
 11 **Q. Mitch Webber is representing you now with 10:00:02**
 12 **regard to this litigation; is that correct?**
 13 A. That's correct, yes. 10:00:06
 14 **Q. Is Steven Safra representing you with 10:00:11**
 15 **regard to this litigation?**
 16 A. Yes. 10:00:15
 17 **Q. Is Mary Borja representing you now with 10:00:15**
 18 **regard to this litigation?**
 19 A. Yes. 10:00:19
 20 **Q. Is Ashley Eiler representing you now with 10:00:20**
 21 **regard to this litigation?**
 22 A. That's not a name that immediately comes 10:00:24
 23 to my head, but I believe it's an associate in one
 24 of the law firms. I don't know the names of all the
 25 lawyers who are doing the background work on the

29

1 case for the law firms.
 2 **Q. Is Nicole Richardson representing you now 10:00:37**
 3 **with regard to this litigation?**
 4 A. Again, yes, yes. 10:00:41
 5 **Q. Is Gabe Groisman representing you now with 10:00:46**
 6 **regard to this litigation?**
 7 A. Yes. 10:00:49
 8 **Q. Is Ben Brodsky representing you now with 10:00:51**
 9 **regard to this litigation?**
 10 A. Ben Brodsky? I would have to check on 10:00:59
 11 that.
 12 **Q. Is Sarah Neely representing you now with 10:01:06**
 13 **regard to this litigation?**
 14 A. Sarah Neely has been my assistant and 10:01:09
 15 paralegal for the last some years and I have used
 16 her to perform paralegal work for me in this
 17 litigation.
 18 **Q. Is Nicholas Maisel representing you now 10:01:27**
 19 **with regard to this litigation?**
 20 A. Nicholas Maisel is my research assistant 10:01:31
 21 and paralegal on this litigation, yes.
 22 **Q. Is your wife representing you with regard 10:01:39**
 23 **to this litigation?**
 24 A. My wife has been instrumental in helping 10:01:42
 25 me gather all the records and information. She

30

1 knows more about records and where my records are
 2 kept and I've asked her to perform paralegal service
 3 in addition to her loving service as my wife.
 4 **Q. Is Harvey Silverglate representing you now** 10:02:04
 5 **with regard to this litigation?**
 6 A. Yes. 10:02:08
 7 **Q. Is Mark Fabiani representing you now with** 10:02:09
 8 **regard to this litigation?**
 9 A. You've asked me that question and the 10:02:12
 10 answer is --
 11 **Q. No, I asked you, sir, if he was your** 10:02:14
 12 **lawyer; but I haven't asked you whether he's**
 13 **representing you now with regard to this litigation.**
 14 A. The answer is yes. 10:02:20
 15 **Q. Is Floyd Abrams representing you now with** 10:02:22
 16 **regard to this litigation?**
 17 A. Yes. 10:02:25
 18 **Q. Is Jamin Dershowitz representing you now** 10:02:26
 19 **with regard to this litigation?**
 20 A. Yes. 10:02:30
 21 **Q. Is Nancy Gertner representing you now with** 10:02:32
 22 **regard to this litigation?**
 23 A. That requires a lengthier answer, if you 10:02:36
 24 will permit me.
 25 **Q. I haven't stopped you yet.** 10:02:41

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1 A. You've tried. 10:02:43
 2 **Q. Much as I may have liked to.** 10:02:44
 3 A. You've tried. 10:02:45
 4 MR. SCOTT: Mr. Scarola, that's probably 10:02:47
 5 one of the few times you and I agree on
 6 something.
 7 MR. SCAROLA: No, we've agreed on a lot, 10:02:52
 8 Tom.
 9 MR. SCOTT: Yeah, we -- I'm kidding you. 10:02:55
 10 I'm kidding you.
 11 MR. SCAROLA: I know you are. 10:02:57
 12 A. Nancy Gertner is one of the attorneys who 10:02:58
 13 called me immediately and expressed outrage at what
 14 was happening to me and offered to help me.
 15 Initially she wanted to help me by calling your
 16 client, Professor Cassell, and explaining to him
 17 that what I've been accused of could not possibly
 18 have happened and there must have been a mistake or
 19 something. And clearly she had confused me with
 20 someone else.
 21 And as I understand it, Nancy Gertner made 10:03:29
 22 that phone call to your client, Professor Cassell,
 23 and Professor Cassell reiterated his false
 24 accusation against me.
 25 Thereafter, Nancy Gertner volunteered to 10:03:42

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1 become part of my legal team and to examine some of
 2 the witnesses in this case.
 3 BY MR. SCAROLA: 10:03:55
 4 **Q. Did you ever accept that offer from Nancy** 10:03:56
 5 **Gertner --**
 6 A. Yes. 10:03:59
 7 **Q. -- so as to establish an attorney-client** 10:03:59
 8 **relationship with --**
 9 A. Yes. 10:04:04
 10 **Q. So she is one of your lawyers --** 10:04:04
 11 A. She is currently -- I regard her currently 10:04:05
 12 as one of my lawyers, yes.
 13 **Q. And is Mitch Webber one of your lawyers in** 10:04:08
 14 **this case?**
 15 A. Yes. 10:04:11
 16 **Q. But if I just give you a name without** 10:04:12
 17 **repeating the second part, "is that one of the**
 18 **lawyers in your case," will you understand --**
 19 A. I understand. 10:04:21
 20 **Q. -- that I'm asking you with regard to** 10:04:22
 21 **these -- each of these individuals whether they are**
 22 **a lawyer representing you in this case?**
 23 A. Yes. 10:04:30
 24 **Q. Okay. Anthony Julius?** 10:04:30
 25 A. Anthony Julius is a British barrister and 10:04:35

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1 solicitor who I conferred with regarding the
 2 possibility of filing lawsuits against your clients
 3 in Great Britain. I continue to confer with him on
 4 matters relating to defamation.
 5 **Q. So you consider him to be one of your** 10:04:54
 6 **lawyers representing you with regard to matters**
 7 **relating to this lawsuit?**
 8 A. I'll stand by -- 10:05:00
 9 MR. SCOTT: Objection, form. 10:05:01
 10 A. -- my answer. I'll stand by my answer. 10:05:02
 11 BY MR. SCAROLA: 10:05:04
 12 **Q. Charles Ogletree?** 10:05:05
 13 A. Charles Ogletree is a close personal 10:05:06
 14 friend and colleague at the Harvard Law School with
 15 whom I have conferred about this case. I always
 16 have regarded him as a personal attorney and
 17 continue to confer with him about this case and the
 18 general picture. So, I do regard him as one of my
 19 lawyers in this litigation, yes. I certainly regard
 20 him as having been given privileged information as
 21 part of a lawyer-client privilege, yes.
 22 **Q. There -- there may be a time when I need** 10:05:47
 23 **more than just an answer to the question that I'm**
 24 **asking as to whether these individuals are or are**
 25 **not your lawyers in this case. That's not now.**

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1 **So if you would, please, I would 10:06:01**
 2 **appreciate it if you would tell me only whether**
 3 **these individuals are or are not your lawyers in**
 4 **this case.**
 5 A. I'm sorry, but I cannot comply with that. 10:06:09
 6 I'm --
 7 **Q. Well, you can but you refuse to. 10:06:12**
 8 MR. SCOTT: Let's not interrupt him. 10:06:14
 9 A. Let me complete my answer, please. 10:06:16
 10 MR. SCOTT: It doesn't help the court 10:06:17
 11 reporter or the record.
 12 A. I've been teaching legal ethics for close 10:06:19
 13 to 40 years. I understand the complexity of the
 14 lawyer-client relationship. And it's impossible as
 15 to some of the names you've mentioned to simply give
 16 a yes or no answer to whether they are representing
 17 me in this case.
 18 What I can do is give you the facts and 10:06:39
 19 then you and others can draw legal conclusions from
 20 those facts. But I -- I cannot, under my oath to
 21 tell the truth, the whole truth and nothing but the
 22 truth, respond to questions with yes or no answers
 23 when those questions do not call for simplistic yes
 24 or no answers.
 25

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1 BY MR. SCAROLA: 10:07:01
 2 **Q. Is Philip Heymann a lawyer representing 10:07:01**
 3 **you in this case?**
 4 A. I have conferred with Philip Heymann on 10:07:04
 5 several occasions about several aspects of this case
 6 and I regard him, for purposes of lawyer-client
 7 privilege, as one of my lawyers on this case.
 8 **Q. David Oscar Markus, same question? 10:07:18**
 9 MR. SCOTT: We covered him, didn't we? 10:07:22
 10 A. David Oscar Markus is a former student and 10:07:23
 11 research assistant of mine. Lives in Miami and
 12 practices law. And he has repeatedly called and
 13 offered me legal representation. Has offered to
 14 help me in the legal context of this case. And I've
 15 conferred with him on lawyer-client confidential
 16 basis about this case on several occasion.
 17 BY MR. SCAROLA: 10:07:49
 18 **Q. Thomas Wiegand? 10:07:49**
 19 A. Thomas Wiegand is a litigator in Chicago 10:07:51
 20 with whom I worked along with Carlos Sires and
 21 Sigrid McCawley on the Guma Aguiar case in Florida.
 22 And as soon as this case occurred, Thomas Wiegand
 23 was one of those lawyers who called and offered to
 24 represent me and do whatever he could to help undo
 25 the injustice that had been perpetrated on me by

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1 your clients' false and mendacious allegations
 2 regarding me and Virginia Roberts.
 3 **Q. Jeanne Baker? 10:08:30**
 4 A. Jeanne Baker is a long-term associate, 10:08:32
 5 legal associate and friend who also called and
 6 offered me legal help, legal representation, and I
 7 continue to confer with her on a privileged basis.
 8 **Q. Rick Pildes? 10:08:51**
 9 A. Rick Pildes is a professor at New York 10:08:53
 10 University law school and I sought his legal advice
 11 on a particular issue in this case. And continue to
 12 seek his legal advice.
 13 **Q. Susan Rosen? 10:09:03**
 14 A. Susan Rosen is a prominent lawyer in 10:09:04
 15 Charleston, South Carolina and a cousin of my
 16 wife's. And she has offered me legal advice about
 17 this case as recently as two days ago.
 18 **Q. Alex MacDonald? 10:09:24**
 19 A. Alex MacDonald is my personal lawyer in 10:09:25
 20 several instances in Massachusetts and he has
 21 offered me advice and consultation on this case,
 22 again volunteering in an effort to undo the horrible
 23 injustice that was done to me by your clients'
 24 mendacious willful and unprofessional conduct and
 25 leveling of false charges, sexual misconduct against

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1 me at a time when they knew it wasn't true and
 2 seeking to repeat that charge after they knew that
 3 it was impossible that I could have engaged in any
 4 of the conduct that they have accused me of.
 5 **Q. Barbara Gillers? 10:10:05**
 6 A. Barbara Gillers is at professor at NYU law 10:10:06
 7 school and also the wife of Steven Gillers and she,
 8 along with Steven Gillers, have advised me and
 9 conferred with me about the legal ethics aspects of
 10 this case.
 11 **Q. So you consider her to be one of your 10:10:19**
 12 **lawyers in this case, is that --**
 13 A. I can -- 10:10:22
 14 MR. SCOTT: Object to the form. Go ahead. 10:10:23
 15 Let me make an objection. I know you're just
 16 trying to answer, but go ahead, you can answer,
 17 sir.
 18 A. Sorry. I regard my conversations with her 10:10:29
 19 as having come within the lawyer-client privilege.
 20 We've conferred on a number of occasions about the
 21 ethical misconduct of your clients.
 22 BY MR. SCAROLA: 10:10:43
 23 **Q. Rana Dershowitz? 10:10:43**
 24 A. Rana Dershowitz is my niece and Harvard 10:10:45
 25 law school graduate, former chief counsel for the

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1 U.S. Olympic Committee and a prominent lawyer in
 2 Colorado. And I've conferred with her on numerous
 3 occasions about litigation and strategy and aspects
 4 of this case.

5 **Q. Ella Dershowitz? 10:11:05**
 6 A. Ella Dershowitz is my daughter and she has 10:11:06
 7 served as a paralegal helping me gather material. I
 8 don't think I regard her -- I certainly don't regard
 9 her as a lawyer in the case. But I regard her as
 10 somebody who has been a part of our kind of legal
 11 team.

12 **Q. Ellen Dershowitz? 10:11:29**
 13 A. Ellen -- 10:11:32

14 **Q. Elon? 10:11:33**
 15 A. Elon Dershowitz is my oldest son, child, 10:11:34
 16 and he has served repeatedly in a paralegal capacity
 17 in this case helping me to gather information and
 18 evidence and doing some investigative work for me.

19 **Q. Nathan Dershowitz? 10:11:52**
 20 A. Nathan Dershowitz is my brother. He's a 10:11:52
 21 distinguished attorney in New York, had his own law
 22 firm. And he and I did a lot of our legal cases
 23 together and as soon as this case emerged, I
 24 conferred with him and have conferred with him on
 25 numerous occasions about this case.

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1 **Q. You consider him to be one of your lawyers 10:12:14**
 2 **in this case?**
 3 A. Yes. 10:12:16

4 **Q. Ben Brafman? 10:12:17**
 5 A. Ben Brafman is one of the leading criminal 10:12:19
 6 lawyers and general lawyers in the City of New York?
 7 He has volunteered to help me in any way he could in
 8 this case and we have conferred and I have sought
 9 legal advice from him in this -- in this matter.

10 **Q. Arthur Aidala? 10:12:36**
 11 A. Arthur Aidala is a distinguished member of 10:12:38
 12 the who's president of the Brooklyn Bar Association
 13 and a former district attorney in Brooklyn. He has
 14 volunteered to help me. He was outraged at the
 15 unethical behavior of your clients and has sought
 16 the opportunity to do everything in his power to try
 17 to undo the injustice perpetrated on me by your
 18 clients' mendacious and false and unethical
 19 allegations against me, and I continue to confer
 20 with him.

21 **Q. David Zornow? 10:13:15**
 22 A. David Zornow is the senior litigating 10:13:17
 23 partner at Skadden Arps in New York. He has offered
 24 to assist me in this matter and I've conferred with
 25 him and sought his legal advice.

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1 **Q. Charles Johnson? 10:13:31**
 2 A. Charles Johnson is my former research 10:13:32
 3 assistant and paralegal. I think we've taken his
 4 name off the list of lawyers because he now, I
 5 think, performs more of a journalistic job than a
 6 legal one, though he has offered to help me gather
 7 information on your clients.

8 **Q. When did you cease considering Charles 10:14:02**
 9 **Johnson to be your lawyer with regard to matters**
 10 **relating to this case?**
 11 A. After a conference with my attorneys in 10:14:10
 12 Washington, D.C. about ten days ago or so. We went
 13 through the list and that was one that I said was
 14 too close a question and I would regard him more as
 15 a blogger and a journalist than as a lawyer. But
 16 it's a close question.

17 **Q. David Efron? 10:14:32**
 18 A. David Efron is a prominent lawyer in 10:14:33
 19 Miami, Florida and Puerto Rico. He was one who
 20 called me immediately and offered his assistance,
 21 the assistance of his law firm. I've conferred with
 22 him repeatedly about this case.

23 **Q. In an attorney-client capacity; is that 10:14:54**
 24 **correct?**
 25 A. Yes. 10:14:57

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1 **Q. Ashe? 10:14:57**
 2 A. Thomas Ashe is not a lawyer. He was one 10:14:58
 3 of the first people I called on the day I was
 4 informed of the lies being spread by your clients.
 5 Because he could help me gather all the information
 6 necessary to prove that the only time I was ever in
 7 New Mexico was visiting him and his wife, who is a
 8 prominent film person, and his daughter, who is a
 9 sex offender prosecutor in the Brooklyn District
 10 Attorney's Office who specializes in sex
 11 trafficking.

12 I needed to call them to prove what I knew 10:15:49
 13 immediately, that the only time I was ever at
 14 Jeffrey Epstein's ranch was when I went to visit the
 15 Ashes in New Mexico. I spoke to their daughter, the
 16 prosecutor's, class. She was then in high school,
 17 and took a day trip to Santa Fe.

18 Ashe had known -- had heard that Jeffrey 10:16:15
 19 Epstein had bought a ranch, a very large ranch in
 20 New Mexico and Ashe was very interested in the
 21 outdoors and asked me if I would do him a favor and
 22 call to see if we could just take a look at what the
 23 ranch looked like. And I did that.

24 And we spent about an hour looking around 10:16:35
 25 the house that was under construction. And I needed

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1 Ashe to gather all the evidence for me, including
 2 journal entries in his daughter's journal,
 3 photographs, other evidence and proof of our visit
 4 to the ranch, which your client encouraged Virginia
 5 Roberts to include in an affidavit -- perjurious
 6 affidavit, that she submitted with details, false
 7 and mendacious details that could not have occurred
 8 about an alleged sexual encounter between her and me
 9 at the ranch in New Mexico.

10 **Q. Which of my clients are you swearing under 10:17:30**
 11 **oath encouraged Virginia Roberts to include**
 12 **allegations of an encounter with you at the**
 13 **New Mexico ranch?**

14 A. Both of them, both of your clients, both 10:17:49
 15 Judge Cassell and Mr. Edwards were both involved in
 16 encouraging your client to file a perjurious
 17 affidavit that they knew or should have known was
 18 perjurious and did know was perjurious recently when
 19 they sought to file another defamatory allegation in
 20 the federal proceeding.

21 **Q. Was the encouragement such that what you 10:18:21**
 22 **are charging Bradley Edwards and Professor Paul**
 23 **Cassell with doing was suborning perjury?**

24 A. Absolutely. 10:18:34
 25 MR. SCOTT: Objection, form. 10:18:35

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1 Go ahead. 10:18:36
 2 A. Absolutely. If you ask me the question, I 10:18:37
 3 am directly charging Judge Cassell and Bradley
 4 Edwards with suborning perjury. I have been advised
 5 that Virginia Roberts did not want to mention me,
 6 told her friends that she did not want to mention
 7 me. And was, quote, pressured by her lawyers into
 8 including me and including these totally false
 9 allegations against me. Yes, your clients are
 10 guilty of suborning perjury.

11 BY MR. SCAROLA: 10:19:06
 12 **Q. Who told you that Bradley Edwards 10:19:06**
 13 **pressured Virginia Roberts into falsely identifying**
 14 **you?**

15 A. A friend of Virginia Roberts, who called 10:19:17
 16 me out of the blue, and told me that she was
 17 horrified by what was happening to me, and that she
 18 recently had meetings with Virginia Roberts and
 19 Virginia Roberts had told her that she never
 20 mentioned me previously. That the lawyers pressured
 21 her into mentioning me. And mentioning me over her
 22 desire not to mention me, yes.

23 **Q. Do you remember what the question is? 10:19:55**

24 A. Yes, and I answered it. 10:19:57
 25 **Q. What do you understand the question to be 10:19:59**

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1 **that you were answering?**

2 MR. SCOTT: Object to form. 10:20:01
 3 BY MR. SCAROLA: 10:20:01
 4 **Q. Based upon your superb memory, what is it 10:20:02**
 5 **that I asked you?**

6 A. I think you asked me to tell me how I 10:20:07
 7 found out who told me that your clients had suborned
 8 perjury.

9 BY MR. SCAROLA: 10:20:14
 10 **Q. No, sir. What I asked you was to give me 10:20:14**
 11 **a name. Who?**

12 MR. SCOTT: Objection. 10:20:17
 13 BY MR. SCAROLA: 10:20:18
 14 **Q. Who? What's the name of the person? 10:20:18**

15 A. Her name is -- her first name is Rebecca. 10:20:20
 16 **Q. Yes. 10:20:25**

17 A. I don't know her last name. 10:20:26
 18 **Q. Did you attempt to find out her last name? 10:20:28**

19 A. I have her last name written down but -- 10:20:30
 20 **Q. Where? 10:20:32**

21 A. It's in my -- in my notes. And I could 10:20:34
 22 get it for you.

23 **Q. When did you -- 10:20:40**

24 A. I have told -- 10:20:41
 25 **Q. When did you write Rebecca's name down? 10:20:43**

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1 A. When she -- when she first called me -- 10:20:45
 2 let me be very clear since you've asked me the
 3 question.

4 At first her husband and she called me on 10:20:50
 5 the phone. They would not give me their names.
 6 They did not want to disclose their names. But they
 7 told me the story. We had a series of phone
 8 conversations in which I asked them, please, to tell
 9 me their names. And after a period of time, after
 10 she told me the story in great detail, she was
 11 willing to give me her name. She asked me to
 12 promise that I would not disclose her identity
 13 without her permission. I have been trying to call
 14 her. Called her as recently as this morning and
 15 last night.

16 I want to recall -- I don't think I called 10:21:35
 17 her this morning. I called her twice last night to
 18 try to get her permission to reveal her complete
 19 name and identity. But I have the name and I will
 20 be happy to give it to you. I just don't have it on
 21 off the top of my head.

22 **Q. You obviously had her telephone number 10:21:52**
 23 **also?**

24 A. No. She called me and she wouldn't give 10:21:54
 25 me a phone number, initially. And she said and her

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1 husband said she would call me back. They were
 2 being quite circumspect about this. Ultimately I
 3 got her phone number. Yes, I have her phone number.
 4 **Q. I'm a little bit confused. 10:22:10**
 5 A. There's no reason -- 10:22:12
 6 **Q. Is the answer -- 10:22:12**
 7 A. There's no reason for you to be confused. 10:22:12
 8 **Q. Well, I am. Is the answer to the question 10:22:14**
 9 **you do have her phone number or --**
 10 MR. SCOTT: Counsel, you're arguing with 10:22:19
 11 the witness.
 12 BY MR. SCAROLA: 10:22:19
 13 **Q. -- you do have her phone number or you 10:22:19**
 14 **don't have her phone number?**
 15 A. I don't have the phone number in my head. 10:22:21
 16 I have the phone number written down, yes.
 17 **Q. And the last time you called her was -- 10:22:27**
 18 A. Last night. 10:22:29
 19 **Q. -- last night? 10:22:29**
 20 A. That's right. Left a message. 10:22:30
 21 **Q. From where? 10:22:32**
 22 A. From my apartment in Miami Beach. 10:22:33
 23 **Q. Did you call her from a cell phone or a 10:22:41**
 24 **landline?**
 25 A. Cell phone. 10:22:44

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1 **Q. Is it the cell phone that you have with 10:22:49**
 2 **you right now?**
 3 A. It is a cell phone that I have with me 10:22:54
 4 right now.
 5 **Q. Would you take out your cell phone and 10:22:56**
 6 **tell us what that number is, please.**
 7 MR. SCOTT: We'll do -- I'm not going to 10:23:00
 8 have him do that. At a break I'll speak to him
 9 and we'll provide you the number, as he's
 10 indicated.
 11 BY MR. SCAROLA: 10:23:07
 12 **Q. How many phone conversations did you have 10:23:12**
 13 **with this person Rebecca?**
 14 A. More than six. Probably between six and 10:23:21
 15 ten, maybe closer to ten. The first few she called
 16 me and after I got their number I called her a
 17 number of times.
 18 **Q. What is her husband's name? 10:23:43**
 19 A. Michael. Different last name from hers, 10:23:44
 20 but again. . .
 21 **Q. Where do they live? 10:23:50**
 22 A. Palm Beach. Or West Palm Beach, in the 10:23:51
 23 Palm Beach area. They have been friends of Virginia
 24 Roberts since she was a young child.
 25 **Q. Were there any witnesses to any of these 10:24:03**

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1 **phone conversations other than Rebecca, Michael and**
 2 **you?**
 3 A. Yes. 10:24:10
 4 **Q. Who? 10:24:11**
 5 A. My wife. 10:24:11
 6 **Q. When did the first conversation occur? 10:24:14**
 7 A. I can probably get you specific 10:24:17
 8 information about that. But it was months ago.
 9 When the story was in the newspapers, she called and
 10 related the entire story to me and related to me
 11 that this was part of a massive extortion plot.
 12 MR. SCOTT: When you're ready to take a 10:24:39
 13 break, let's take break. You've been going
 14 about an hour.
 15 BY MR. SCAROLA: 10:24:43
 16 **Q. How long after the filing of the Crime 10:24:44**
 17 **Victims' Rights Act pleading in which you were**
 18 **referenced did you receive the phone call, the first**
 19 **phone call from Rebecca?**
 20 A. I would be speculating, but it would 10:24:58
 21 probably be about a month or two after that.
 22 MR. SCOTT: Don't speculate, sir. If you 10:25:03
 23 know the facts.
 24 A. I -- I don't recall. 10:25:06
 25

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1 BY MR. SCAROLA: 10:25:06
 2 **Q. Your best estimate as you sit here today 10:25:06**
 3 **is?**
 4 A. Two -- two months, probably. So let's say 10:25:08
 5 January, February -- probably end of February,
 6 beginning of March, but I can get you those specific
 7 dates. There's no secret about that.
 8 MR. SCOTT: Want to take a break? 10:25:22
 9 MR. SCAROLA: In just a moment. 10:25:24
 10 MR. SCOTT: Certainly. 10:25:26
 11 BY MR. SCAROLA: 10:25:26
 12 **Q. Did you take contemporaneous notes of 10:25:30**
 13 **those phone conversations?**
 14 A. No. I took notes of names, but not really 10:25:36
 15 notes of the substance, no.
 16 **Q. Have you ever made notes with regard to 10:25:48**
 17 **the substance of any communication that you**
 18 **allegedly had with Rebecca and/or Michael?**
 19 A. I didn't allegedly have these 10:25:58
 20 conversations. I had these conversations. And I
 21 don't recall taking any notes of these
 22 conversations.
 23 MR. SCOTT: Let's take a break. 10:26:09
 24 MR. SCAROLA: Yes. 10:26:10
 25 VIDEOGRAPHER: Going off the record. The 10:26:12

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1 time is approximately 10:26 a.m.
 2 (Recess was held from 10:26 a.m. until 10:44 a.m.) 10:26:16
 3 VIDEOGRAPHER: Going back on the record. 10:44:08
 4 The time is approximately 10:44 a.m.
 5 BY MR. SCAROLA: 10:44:11
 6 **Q. How many phone calls did you have with 10:44:13**
 7 **this person Rebecca before she informed you as to**
 8 **the reason why she was calling you?**
 9 A. She informed me the first time. 10:44:29
 10 **Q. The very first conversation? 10:44:31**
 11 A. Yes. 10:44:32
 12 **Q. How many phone calls was it before she 10:44:34**
 13 **asked you for money?**
 14 A. Never asked me for money. 10:44:38
 15 **Q. How many phone calls was it before her 10:44:40**
 16 **husband asked you for money?**
 17 MR. SCOTT: Objection, form. 10:44:43
 18 A. I was never asked for money, ever. 10:44:43
 19 BY MR. SCAROLA: 10:44:45
 20 **Q. Do you know how it is that these people 10:44:47**
 21 **knew how to contact you?**
 22 A. They told me they went on my website and 10:44:54
 23 got my number and left a message for me to call.
 24 Yeah, that's what happened. Oh, no, they sent me --
 25 they went on my website and sent me an e-mail and

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1 asked me -- and the e-mail had a blank name but a
 2 way to respond. And so I responded to the e-mail
 3 with my phone number and then they called, is my
 4 recollection. That's my best recollection.
 5 **Q. Is that an e-mail that you produced in 10:45:26**
 6 **discovery?**
 7 A. I have no idea. 10:45:28
 8 MR. SIMPSON: The attorneys have handled 10:45:30
 9 discovery.
 10 BY MR. SCAROLA: 10:45:33
 11 **Q. Have you ever seen that e-mail since it 10:45:34**
 12 **was received?**
 13 A. I have no recollection. 10:45:39
 14 **Q. Certainly you recognized the significance 10:45:40**
 15 **of preserving that e-mail?**
 16 A. I'm sure I have it. 10:45:46
 17 **Q. You sure you have it? 10:45:47**
 18 A. I'm positive, of course. 10:45:48
 19 **Q. So from the very first conversation that 10:45:55**
 20 **you had with this person, you had information**
 21 **indicating that this person was informing you that**
 22 **Bradley Edwards had engaged in unethical conduct,**
 23 **correct?**
 24 MR. SCOTT: Objection, form. 10:46:19
 25 A. Let me just be very clear what -- what she

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1 said to me. She said to me that she had been told
 2 directly by her friend, Virginia Roberts, who stayed
 3 with her overnight for a period of time, that she
 4 never wanted to mention me in any of the pleadings.
 5 And that her two lawyers in the pleadings, or her
 6 lawyers who filed the pleadings, pressured her in to
 7 including my name and the details.
 8 BY MR. SCAROLA: 10:46:52
 9 **Q. Did Rebecca ever suggest to you that the 10:46:53**
 10 **details sworn to by Virginia Roberts with regard to**
 11 **you were false?**
 12 MR. SCOTT: Objection, form. Go ahead. 10:47:08
 13 A. She certainly suggested that, yes. She 10:47:09
 14 mentioned to me that Virginia Roberts had never,
 15 ever mentioned to her me, among any of the people
 16 that she had had any contact with until she -- until
 17 she was pressured into doing so by her lawyers, yes.
 18 BY MR. SCAROLA: 10:47:28
 19 **Q. So, from the very first conversation, the 10:47:29**
 20 **impression you had was that this was a witness who**
 21 **could provide information that Bradley Edwards and**
 22 **Paul Cassell had acted unethically and dishonestly,**
 23 **correct?**
 24 A. I wasn't sure she could provide the 10:47:48
 25 information because she was very reluctant to come

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1 forward. She didn't want to be involved. She
 2 didn't want her name involved. But I knew she had
 3 provided me with information, yes, but I didn't
 4 know, and still don't know, whether she is prepared
 5 to be a witness. I don't know the answer to that
 6 question.
 7 **Q. Well, there is a difference, is there not, 10:48:09**
 8 **sir, between what she could do and what she would**
 9 **do?**
 10 MR. SCOTT: Objection, form. 10:48:16
 11 Argumentative.
 12 A. I don't understand. 10:48:18
 13 BY MR. SCAROLA: 10:48:18
 14 **Q. You don't understand that? 10:48:19**
 15 A. I don't understand that. She could do or 10:48:19
 16 would do.
 17 **Q. She was telling you that she had the 10:48:22**
 18 **ability to impeach Virginia Roberts' assertions**
 19 **against you?**
 20 MR. SCOTT: Same objection. 10:48:31
 21 A. What she told me was the truth, is that 10:48:32
 22 Virginia Roberts never wanted to mention me, but
 23 that she was pressured by her lawyer into mentioning
 24 me. And that was the truth.
 25

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1 BY MR. SCAROLA: 10:48:46

2 **Q. Well, you also have told us that not only 10:48:47**

3 **did she suggest to you that Virginia Roberts didn't**

4 **want to mention you, but that Virginia Roberts had**

5 **not had the sexual encounters with you that she has**

6 **sworn under oath she did have, correct?**

7 MR. SCOTT: Objection. Go ahead. 10:49:07

8 A. What she told me was that she didn't 10:49:09

9 believe -- that is, this woman didn't believe that

10 there had been any contact between me and Virginia

11 Roberts because Virginia Roberts had never mentioned

12 me previously until her lawyers pressured her

13 into -- into allowing my name to be included in the

14 pleading, that's what she told me.

15 BY MR. SCAROLA: 10:49:31

16 **Q. Did you have the impression that there was 10:49:32**

17 **improper pressure that had been exerted on Virginia**

18 **Roberts based upon what you were being told by this**

19 **woman?**

20 MR. SCOTT: Objection, form. 10:49:47

21 A. Absolutely. Of course. 10:49:48

22 BY MR. SCAROLA:

23 **Q. So this was based upon what this woman was 10:49:50**

24 **telling you, evidence of unethical, unprofessional**

25 **dishonest conduct on the part of Bradley Edwards and**

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1 **Paul Cassell, right?**

2 A. That was certainly the impression I got 10:50:04

3 and certainly an impression that confirmed what I

4 already believed. I mean, I've known from day one

5 that they were engaged in unethical, unprofessional,

6 in my view and my opinion, disbarable conduct.

7 This simply confirmed that.

8 **Q. Yes, sir. We're going to get to that 10:50:20**

9 **shortly, but I want to stay focused right now on**

10 **these communications that you claim to have had --**

11 A. Not claimed to have had. 10:50:28

12 **Q. -- with Rebecca. 10:50:29**

13 A. Communications that I had. Let's be 10:50:30

14 clear. Communications that I had. No claim. I had

15 them.

16 **Q. Let's first try, if we could, to pinpoint 10:50:39**

17 **a little better when the first of these**

18 **conversations occurred. Do you recall having been**

19 **propounded interrogatories in this case that asked**

20 **you to identify all persons with knowledge of any**

21 **circumstance in which it is alleged that Bradley**

22 **Edwards engaged in unethical conduct, unprofessional**

23 **conduct or dishonest conduct?**

24 MR. SCOTT: Objection, form. 10:51:13

25 A. I have no recollection as to the sequence 10:51:14

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1 or chronology.

2 BY MR. SCAROLA: 10:51:17

3 **Q. Well, let me hand you for purposes of 10:51:18**

4 **refreshing your recollection the answers to**

5 **interrogatories that were filed as of February 23,**

6 **2015.**

7 A. What was the date again? I missed that. 10:51:55

8 MR. SCOTT: He's going to show you the 10:51:58

9 exhibit.

10 BY MR. SCAROLA: 10:52:00

11 **Q. The answers to interrogatories bear a 10:52:01**

12 **certificate of service dated February 23, 2015 and a**

13 **verification --**

14 MR. SCOTT: Are you going to mark that as 10:52:15

15 an exhibit, please?

16 MR. SCAROLA: I will in just a moment. 10:52:17

17 BY MR. SCAROLA: 10:52:18

18 **Q. And a verification that appears to be your 10:52:19**

19 **signature.**

20 A. It is. 10:52:22

21 **Q. Is that, in fact, your signature? 10:52:23**

22 A. It is, in fact, my signature. 10:52:24

23 **Q. Were you verifying those answers intending 10:52:25**

24 **them to be your sworn responses to those**

25 **interrogatories?**

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1 A. I was verifying my lawyer's responses, 10:52:30

2 yes.

3 **Q. Well, were they your responses or were 10:52:35**

4 **they your lawyer's responses?**

5 A. My lawyers -- 10:52:38

6 MR. SCOTT: Objection, argumentative. 10:52:40

7 You can answer it. 10:52:42

8 A. My lawyers drafted the responses. I was 10:52:42

9 asked to look over them. I looked over them and I

10 signed, yes.

11 BY MR. SCAROLA: 10:52:47

12 **Q. You signed them -- 10:52:48**

13 A. Yes. 10:52:48

14 **Q. -- and swore to their truthfulness, 10:52:49**

15 **correct?**

16 A. Let me just read what it says. 10:52:51

17 Yes, they were true to the best of my 10:52:57

18 knowledge and belief, yes.

19 **Q. Since there is no reference in those 10:53:05**

20 **answers to interrogatories to Rebecca or Michael,**

21 **can we assume that the first of your phone calls**

22 **must have occurred some time after February 23 when**

23 **you verified the answers to those interrogatories?**

24 MR. SCOTT: Objection, form, asked and 10:53:26

25 answered.

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1 A. I don't have a specific recollection as to 10:53:28
 2 the exact date of when the call came.
 3 BY MR. SCAROLA: 10:53:32
 4 **Q. Well, you certainly would not have sworn 10:53:32**
 5 **to the accuracy of those answers which ask you to**
 6 **identify every person with knowledge of any**
 7 **unethical, unprofessional, or dishonest conduct on**
 8 **the part of Bradley Edwards, and omitted the name of**
 9 **Rebecca and Michael --**
 10 MR. SCOTT: Objection, argumentative. 10:53:57
 11 BY MR. SCAROLA: 10:53:58
 12 **Q. -- if they already called you? 10:53:58**
 13 MR. SCOTT: Argumentative and compound. 10:54:01
 14 A. I don't recall when Rebecca and Michael 10:54:03
 15 called me, but I do recall that they made me promise
 16 that I would not disclose the information that they
 17 had revealed until they gave me permission to do so.
 18 They also did not give me their names, initially,
 19 and I only learned both the names over time and the
 20 information.
 21 The information came out gradually. But 10:54:23
 22 there was a time when I did have the information
 23 that the two clients pressured -- that was her word,
 24 "pressured" -- Virginia Roberts into naming me,
 25 right.

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1 BY MR. SCAROLA: 10:54:43
 2 **Q. You certainly considered the communication 10:54:53**
 3 **that you were having with these individuals to be a**
 4 **matter of significance from the timing of the first**
 5 **phone call, correct, since it was in the first phone**
 6 **call that they disclosed to you the essence of what**
 7 **you are saying they said?**
 8 MR. SCOTT: Objection, compound. 10:55:10
 9 A. I wasn't sure whether it would be 10:55:11
 10 significant or not because I didn't know at the time
 11 whether I would be free to reveal it or to use it.
 12 I'm still -- I just wasn't sure whether I 10:55:24
 13 would be free to reveal it. It would not be
 14 particularly significant except to my own
 15 confirmation of what I knew to be true; namely, that
 16 your clients had engaged in unethical and
 17 unprofessional conduct. I knew that to be true.
 18 But this provided me with some confirmation of that.
 19 But I didn't know whether I was going to 10:55:42
 20 be able to use that confirmation because I had made
 21 a promise that was elicited from me by them that I
 22 would not disclose this information without their
 23 permission.
 24 BY MR. SCAROLA: 10:55:55
 25 **Q. All right. Permission that you swore to a 10:55:56**

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1 **little while ago you still haven't received,**
 2 **correct?**
 3 A. I have not received the permission to 10:56:01
 4 identify them by name, that's right.
 5 By the way, in the recess -- oh, no, 10:56:10
 6 that's enough. Okay.
 7 **Q. What happened in the recess? 10:56:15**
 8 MR. SCOTT: Objection -- 10:56:17
 9 A. I spoke to my lawyers. 10:56:18
 10 MR. SCOTT: -- don't answer that. It's 10:56:19
 11 conversations with counsel.
 12 BY MR. SCAROLA: 10:56:20
 13 **Q. You spoke to whom? 10:56:20**
 14 A. I spoke to my lawyers. 10:56:21
 15 **Q. Was your promise to these people that you 10:56:29**
 16 **wouldn't disclose their last name?**
 17 A. My promise to the people was that I would 10:56:36
 18 not identify them so that they would not be hassled
 19 and harassed and any pressure put on them. That was
 20 their concern, that they didn't want to be receiving
 21 phone calls and they didn't want to be part of what
 22 they regarded as a media circus.
 23 **Q. Well, you know you have broken that 10:56:57**
 24 **promise at this point, haven't --**
 25 A. No, I haven't -- 10:57:01

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1 MR. SCOTT: Objection -- 10:57:01
 2 A. -- broken that promise. 10:57:01
 3 BY MR. SCAROLA: 10:57:02
 4 **Q. You have not? 10:57:02**
 5 A. No. 10:57:02
 6 **Q. You don't think that they will be able to 10:57:02**
 7 **be identified by the first names that you have**
 8 **given? The fact that they live in Palm Beach, and**
 9 **the fact that Virginia Roberts lived together with**
 10 **them for some period of time, that's not identifying**
 11 **information?**
 12 A. Not -- 10:57:18
 13 MR. SCOTT: Objection. 10:57:19
 14 A. Not for the media, which is what they're 10:57:19
 15 concerned about. They're concerned about getting
 16 calls from the media and being harassed.
 17 BY MR. SCAROLA: 10:57:25
 18 **Q. Well, you are aware of the fact that 10:57:25**
 19 **there's a press representative sitting in this room,**
 20 **aren't you?**
 21 A. Yes. I don't think there's enough 10:57:29
 22 information for them to identify these folks unless
 23 you provide them with that information.
 24 **Q. How long have you been a member of the 10:57:37**
 25 **Bar?**

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1 A. Over 50 years. 10:57:47

2 **Q. And during that period of time, you've 10:57:48**

3 **been involved in many, many litigated matters,**

4 **correct?**

5 A. I'm mostly an appellate lawyer, but I have 10:57:56

6 been involved in many appeals, yes.

7 **Q. You do understand that you cannot make a 10:58:01**

8 **binding promise to a potential witness that would**

9 **authorize you to withhold information that you are**

10 **required to give in the course of discovery --**

11 MR. SCOTT: Objection, form. 10:58:22

12 BY MR. SCAROLA: 10:58:22

13 **Q. -- correct? 10:58:22**

14 A. I told them in the course of my 10:58:23

15 conversations with them that I would not violate any

16 court orders, that I would not break the law, that I

17 would do my best to maintain what they wanted

18 because it was very important for me to get as much

19 information from them as I could. I did not want to

20 cut off my sources of information. I think I have a

21 right to obtain that information.

22 And so there was a back and forth. And 10:58:49

23 ultimately I think we all realized ultimately

24 probably their names will be revealed, yes.

25

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1 BY MR. SCAROLA: 10:59:02

2 **Q. What is their phone number? 10:59:02**

3 A. I don't have it. 10:59:04

4 MR. SCOTT: You can make a request when 10:59:06

5 you want to and we'll take it under

6 consideration for the information that you've

7 asked my client about. He's not the lawyer. I

8 am. There's confidentiality orders. I have to

9 review all of that. You can take whatever

10 appropriate discovery you want on that.

11 MR. SCAROLA: What -- what confidentiality 10:59:17

12 orders?

13 MR. SCOTT: There's a confidentiality 10:59:19

14 order by the Court.

15 MR. SCAROLA: That covers the phone number 10:59:21

16 of a witness?

17 MR. SCOTT: That covers various issues and 10:59:24

18 I have to review it. And so you can -- I'm

19 just telling you that you can make any formal

20 request you want and we will take it up.

21 BY MR. SCAROLA: 10:59:33

22 **Q. Was it your understanding in February of 10:59:37**

23 **this year that you had the authority to withhold in**

24 **answers to interrogatories the names of these**

25 **individuals if questions were asked that called for**

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1 **the disclosure of those names?**

2 MR. SCOTT: Objection, asked and answered 10:59:58

3 several times.

4 A. Obviously I confer with my lawyers about 11:00:00

5 matters of that kind.

6 BY MR. SCAROLA: 11:00:05

7 **Q. That's not my question to you. Was it 11:00:05**

8 **your understanding in February of 2015, on**

9 **February 23, 2015, when you signed these answers to**

10 **interrogatories under oath, that you had the**

11 **authority to withhold the names of these individuals**

12 **who you claim to be witnesses?**

13 MR. SCOTT: Objection, legal conclusion. 11:00:27

14 A. I don't believe I had their names on 11:00:28

15 February 23. I would have to check. But my belief

16 is that I didn't have their names. It took quite --

17 quite a bit of effort for me to obtain their names

18 under promises of confidentiality.

19 I think these are very, very hard legal 11:00:41

20 and ethical questions. There's obviously a right to

21 investigate and to try to get information,

22 particularly information that would proffer that

23 your clients had engaged in criminal actions,

24 subornation of perjury and pressuring witnesses.

25 And I know that many of you are former 11:01:00

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1 prosecutors. I know that prosecutors also try very

2 hard to obtain such information and make promises

3 and the Courts have varying approaches to how these

4 promises will be dealt with.

5 So it was a complicated question. And I 11:01:18

6 sought my legal advice based on it being a

7 complicated question.

8 BY MR. SCAROLA: 11:01:24

9 **Q. When did you first seek legal advice with 11:01:25**

10 **regards to these matters?**

11 A. When I first found out about it, I told my 11:01:29

12 lawyers that the information had come -- that it

13 hadn't been -- I hadn't gotten permission. That I

14 was getting it in dribs and drabs. And that I was

15 anxious to pursue it. I told my lawyers not to call

16 her at all, not to call them. Because I thought

17 that would shut down the flow of information.

18 **Q. Which lawyers did you take these 11:01:53**

19 **disclosures to?**

20 MR. SCOTT: Let him ask that question. 11:02:02

21 MR. SIMPSON: Just the names. 11:02:04

22 A. My recollection is Ken Sweder, and I would 11:02:05

23 have to check my records but probably -- probably

24 Mr. Simpson, probably. Probably Mr. Scott. But I'm

25 not positive about Mr. Scott at this point, about

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1 Judge Scott. I'm not positive about that.

2 BY MR. SCAROLA: 11:02:32

3 **Q. And what is it that you disclosed to 11:02:33**

4 **Mr. Sweder?**

5 MR. SCOTT: Objection. Don't answer that. 11:02:38

6 Attorney-client privilege and work product.

7 MR. SCAROLA: Our position is that it's 11:02:41

8 already been waived voluntarily by virtue of

9 the testimony that was just given.

10 MR. SCOTT: I understand your position. 11:02:45

11 We don't agree.

12 MR. SCAROLA: That's fine. I know you 11:02:47

13 don't.

14 MR. SCOTT: Okay. 11:02:49

15 BY MR. SCAROLA: 11:02:49

16 **Q. What information did you give to 11:02:50**

17 **Mr. Simpson with regard to this --**

18 MR. SCOTT: Same objection. 11:02:54

19 BY MR. SCAROLA: 11:02:54

20 **Q. -- communication? 11:02:55**

21 MR. SCOTT: Don't answer that. 11:02:57

22 BY MR. SCAROLA: 11:02:59

23 **Q. And since you don't remember whether you 11:03:00**

24 **did or did not tell Mr. Scott, I assume you don't**

25 **remember what information you may have given to**

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1 **Mr. Scott if you did speak to him; is that correct?**

2 MR. SCOTT: The same objection. Don't 11:03:08

3 answer that.

4 BY MR. SCAROLA: 11:03:14

5 **Q. Since you were -- well, did you make these 11:03:15**

6 **disclosures to your lawyers as soon as you got the**

7 **first phone call?**

8 MR. SCOTT: Objection. Don't answer that. 11:03:29

9 BY MR. SCAROLA: 11:03:33

10 **Q. You obviously considered this to be a 11:03:37**

11 **significant communication, correct?**

12 A. Potentially -- 11:03:41

13 MR. SCOTT: Objection, repetitious. 11:03:42

14 You've asked that several times.

15 A. Potentially significant, but I did not 11:03:44

16 know -- well, it was significant to me because it

17 confirmed my own knowledge that your clients had

18 engaged in behavior which was unprofessional and

19 possibly criminal. And it confirmed it in my own

20 mind. So it was very gratifying to me.

21 But I had -- didn't know at that point 11:04:07

22 whether I could in any way use that information to

23 produce the truth in the litigation. I wasn't sure

24 of that.

25

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1 BY MR. SCAROLA: 11:04:16

2 **Q. You knew that you might be able to and so 11:04:17**

3 **it was significant to you --**

4 MR. SCOTT: Object. 11:04:21

5 BY MR. SCAROLA: 11:04:21

6 **Q. -- is that correct? 11:04:22**

7 MR. SCOTT: Form. 11:04:23

8 A. It was significant to me psychologically 11:04:24

9 because it confirmed my firm belief that your

10 clients had engaged in unethical behavior, yes.

11 BY MR. SCAROLA: 11:04:34

12 **Q. As an experienced criminal defense lawyer, 11:04:34**

13 **you certainly recognize the importance of a**

14 **contemporaneous record of significant**

15 **communications, don't you?**

16 A. Sometimes. But it's more important to me 11:04:45

17 to have the conversation and to try to be in the

18 moment and elicit the information. And that was

19 what my focus was at the time.

20 **Q. Was there something that prevented you 11:04:56**

21 **from taking contemporaneous notes with regard to**

22 **these communications?**

23 A. I -- I generally don't take 11:05:04

24 contemporaneous notes.

25 **Q. That's not my question, sir. 11:05:07**

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1 MR. SCOTT: Don't cut him off, please. 11:05:07

2 A. I generally don't take notes. I find that 11:05:08

3 it's much more important to concentrate. In fact, I

4 tell my students in my classes not to take notes but

5 rather to listen, listen carefully to what's being

6 said. I'm not a particular advocate of note taking.

7 BY MR. SCAROLA: 11:05:23

8 **Q. And since you have a superb memory, the 11:05:23**

9 **notes don't have much value to you?**

10 A. In fact -- 11:05:28

11 MR. SCOTT: Objection, form. 11:05:29

12 A. In fact, my memory is one of the reasons 11:05:30

13 that I don't focus on notes as much as some other

14 people may.

15 BY MR. SCAROLA: 11:05:37

16 **Q. So let's go through these conversations 11:05:37**

17 **one at a time then.**

18 A. Okay. 11:05:40

19 **Q. And I want you to tell us, based upon your 11:05:41**

20 **superb memory, as best you are able to relate,**

21 **word-for-word exactly how the first conversation**

22 **went.**

23 A. Okay. 11:05:55

24 **Q. Who placed the call to whom? 11:05:56**

25 A. The first conversation came as a result of 11:05:59

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1 me getting a phone number from them by an e-mail or
 2 text correspondence. I then placed -- this is my
 3 best memory. I then placed the conversation and I
 4 spoke to Michael.

5 **Q. You then placed the phone call? 11:06:19**
 6 A. I then placed the phone call. And I spoke 11:06:20
 7 to Michael. Michael told me that his wife, Rebecca,
 8 felt terrible about what was going on in relation to
 9 me, but that she was not willing to talk to me about
 10 it. But he then said to me that if she did talk to
 11 me, she would tell me that I was not mentioned by
 12 Virginia ever previously until this case occurred,
 13 and that she was pressured into mentioning me.

14 I said that would be important to me, I 11:07:04
 15 would really like to talk to Rebecca.

16 Well, he said, she's very emotional about 11:07:07
 17 this, she's a very close friend of Virginia, she
 18 likes Virginia, and she just doesn't want to get
 19 involved.

20 And I said, well, let's have -- please 11:07:21
 21 have her think about it. And let's see if we can
 22 talk again.

23 I then made a second phone call. 11:07:29
 24 **Q. I'm sorry, I was still on the first one. 11:07:31**
 25 A. Okay. That was the first phone call. 11:07:33

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1 That's about the first phone call.

2 **Q. Thank you. All right. Now, during the 11:07:36**
 3 **course of that phone call, did you ever ask Michael,**
 4 **why did you ask me to contact you if your wife**
 5 **doesn't want to talk to me?**

6 MR. SCOTT: Objection, form, 11:07:46
 7 argumentative.

8 A. I did not. 11:07:48

9 BY MR. SCAROLA: 11:07:48

10 **Q. Why not? 11:07:49**

11 MR. SCOTT: Same objection. 11:07:51

12 BY MR. SCAROLA: 11:07:51

13 **Q. Did that seem strange to you? 11:07:51**
 14 A. No, never occurred to me. He was 11:07:53
 15 obviously reaching out to me. There was obviously
 16 some ambivalence. They wanted to talk to me. They
 17 didn't want to get involved. They were testing the
 18 waters. They wanted to see if I was a reliable
 19 person. I think they wanted to get a sense of me,
 20 just as I was trying to get a sense of them.

21 **Q. Did they tell you at that point in time 11:08:16**
 22 **that they lived in the Palm Beach area in the first**
 23 **conversation?**

24 MR. SCOTT: Same objection. 11:08:25
 25 A. I don't recall, but I think they did. I 11:08:26

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1 think they did.

2 BY MR. SCAROLA: 11:08:31

3 **Q. They or he? 11:08:31**

4 A. He. He's the only one who spoke to me. I 11:08:32
 5 also had their phone number, which I think I recall
 6 is in that area generally. I didn't know
 7 specifically where they lived. I did not have their
 8 address.

9 **Q. Were arrangements made during the first 11:08:52**
 10 **conversation for a subsequent communication?**

11 A. No. 11:08:56

12 **Q. Was any request made by you for a meeting? 11:08:59**

13 A. Yes. 11:09:02

14 **Q. Let me back up then, if I could, please. 11:09:05**
 15 **Because what I want you to do, based upon your**
 16 **superb memory, is to tell us in as much detail as**
 17 **you possibly can recall everything that was said.**
 18 **And when I asked you to do that, you didn't say**
 19 **anything about a request for a meeting.**

20 A. I'm not sure -- 11:09:28

21 MR. SCOTT: Objection, asked and answered. 11:09:29

22 A. I'm not sure the request for the meeting 11:09:30
 23 came in the first call or the second call. But
 24 there was ultimately a request for a meeting. It
 25 wouldn't surprise me if it came in the first call.

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1 The first call was basically, I'd really 11:09:41
 2 like to talk to your wife about this. I'm happy to
 3 fly down. I'm happy to talk to you on the phone.
 4 And we left it that they would think -- that she
 5 would -- that he would ask her to think about it.
 6 And that I could call back in a -- in a few days and
 7 find out what her -- what her current feelings were.

8 BY MR. SCAROLA: 11:10:09

9 **Q. Where were you when you received this 11:10:09**
 10 **phone call -- or when you made this phone call?**

11 Sorry.

12 A. I think I was in New York. 11:10:14

13 **Q. Do you know whether that phone call was 11:10:23**
 14 **made on a cell phone or a landline?**

15 A. I don't remember. 11:10:26

16 **Q. Have you attempted to gather your 11:10:37**
 17 **telephone records for purposes of responding to**
 18 **discovery requests in this case?**

19 A. I left that to my lawyers. I know that we 11:10:47
 20 did produce telephone records during the relevant
 21 periods of time when Virginia Roberts knew Jeffrey
 22 Epstein and those telephone records established that
 23 I could not have been at the locations and at the
 24 times that Virginia Roberts claimed to have had --
 25 falsely claimed to have sexual contact with me.

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1 **Q. I promise you we're going to get to those.** 11:11:15
 2 A. Good. 11:11:18
 3 **Q. Promise you. Along with all the flight logs that you claim exonerate you.** 11:11:18
 4
 5 A. Is that a question? 11:11:25
 6 **Q. It wasn't. It was a comment.** 11:11:26
 7 MR. SCOTT: I object. 11:11:28
 8 BY MR. SCAROLA: 11:11:29
 9 **Q. In response to your comment.** 11:11:29
 10 MR. SCOTT: Let me just say this to you, I 11:11:31
 11 think it's inappropriate to have comments by
 12 counsel.
 13 BY MR. SCAROLA: 11:11:36
 14 **Q. Let's go to the very second contact that you had with either Michael or Rebecca. Who initiated the second contact?** 11:11:37
 15
 16
 17 A. I think I did. I called and got Michael 11:11:48
 18 on the phone.
 19 **Q. Where did you call from?** 11:11:53
 20 A. I think New York. 11:11:54
 21 **Q. Tell me in as much detail as your superb memory allows you to recall everything that was said during the course of that phone conversation.** 11:12:02
 22
 23
 24 MR. SCOTT: Let's object to the form and 11:12:14
 25 the continued use of the word "superb." He's

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1 described his memory. That's your
 2 characterization. Go ahead.
 3 MR. SCAROLA: No, I think that that was 11:12:24
 4 Mr. Dershowitz's characterization, which I have
 5 adopted.
 6 MR. SCOTT: Okay. Go ahead. 11:12:29
 7 A. I called, spoke to Michael. I asked 11:12:31
 8 Michael if he had spoken to his wife. She said yes
 9 and she was still reluctant to talk to me.
 10 BY MR. SCAROLA: 11:12:41
 11 **Q. I'm sorry, she said yes when you asked Michael if he had spoken to his wife?** 11:12:41
 12
 13 A. He said yes. And that she was still 11:12:46
 14 reluctant to talk to me. I suggested to him that
 15 perhaps she could talk to me briefly just so that
 16 she hears what I have to say. And he could listen
 17 and remain on the phone and she could stop at any
 18 time she wanted.
 19 And there came a time during that 11:13:07
 20 conversation when she did get on the phone, and
 21 here's what she told me. She said she had grown up
 22 with Virginia Roberts. That they were very, very
 23 close friends as young people. That Virginia
 24 Roberts came to stay with her for a number of days,
 25 I think it was over Halloween, and they had gone out

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1 and had dinner, just the two of them. And that she
 2 confided in her, Virginia Roberts confided in
 3 Rebecca that she had never wanted to mention me in
 4 any of the pleadings, but she was pressured by her
 5 lawyer into doing so.
 6 Rebecca then said that I was not the 11:14:09
 7 object of this effort. The object of the effort was
 8 a billionaire who lives in Columbus, Ohio and who
 9 owns Victoria's Secret and the Limited, Too.
 10 Rebecca told me she did not know the name of that
 11 billionaire, but that Virginia and her lawyers hoped
 12 to get 1 billion, B-I-L-L-I-O-N, \$1 billion or half
 13 of his net worth from him by alleging that he had
 14 improperly engaged in sexual misconduct with
 15 Virginia Roberts.
 16 That that money would be divided three 11:15:12
 17 ways: A third of it to Virginia Roberts, a third of
 18 it to a charity that she and her lawyers were
 19 setting up for battered women, and a third of it to
 20 the lawyers.
 21 She then told me that they were trying to 11:15:35
 22 get ABC News to interview Virginia Roberts so as to
 23 give her credibility in order to pressure the
 24 billionaire from Columbus, Ohio into paying a large
 25 sum of money. And that I was named as an effort to

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1 try to show the billionaire what could happen to
 2 somebody if they were accused of sexual misconduct.
 3 And that would encourage him to settle a lawsuit or
 4 pay money in exchange for his name not being
 5 mentioned or revealed.
 6 I had no idea about this. And I didn't -- 11:16:44
 7 I didn't ask about this. She just stated this. And
 8 I then corroborated the fact that she was absolutely
 9 correct in everything she had said to me.
 10 **Q. You corroborated the fact that she was absolutely correct in everything that she had said to you?** 11:17:09
 11
 12
 13 A. That's right. 11:17:15
 14 **Q. How?** 11:17:20
 15 A. Okay. Let me answer that question. I was 11:17:21
 16 very -- I wasn't sure, so I called Leslie Wexner. I
 17 got his wife on the phone, Abigail Wexner.
 18 Obviously I knew that the only billionaire in
 19 Columbus, Ohio who owned Limited, Too and who owned
 20 Victoria's Secret was Leslie Wexner.
 21 I had met Leslie Wexner on two occasions, 11:17:47
 22 I think, and his wife. I called Abigail on the
 23 phone and I said, I think you ought to know that
 24 there is an extortion plot being directed against
 25 your husband by unscrupulous lawyers in -- in

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1 Florida.

2 And she said, oh, we're aware of that, 11:18:09

3 they've already been in contact with us, which

4 surprised me. But was confirmation of that.

5 I then also -- I can't give you the 11:18:24

6 chronology of that. I then was in touch with ABC and

7 found out she was absolutely correct about her

8 efforts to try to get interviewed on ABC television.

9 In fact, I learned that your client, Brad 11:18:41

10 Edwards, had sent a communication to people in

11 the -- in the area urging them to watch her

12 interview that was scheduled to be on three

13 television programs. If I'm not mistaken, it was

14 Good Day Show, the evening news, and the show

15 Nightline -- and Nightline.

16 I then was in communication with ABC and 11:19:10

17 helped to persuade them that they would be putting

18 false information on the air if they allowed

19 Virginia Roberts to tell her false story.

20 So, I was able to corroborate that. I 11:19:28

21 then also corroborated the fact that she had never

22 mentioned me when her boyfriend appeared on

23 television and publically stated that she had never

24 mentioned me in any of her description of people who

25 she had sexual contact with.

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1 So, I was then completely satisfied that 11:19:53

2 Rebecca was telling me the complete truth. And that

3 in my view, there was an extortion plot directed

4 against Leslie Wexner, a criminal extortion plot

5 directed against Leslie Wexner, and that your

6 clients were involved in that extortion plot.

7 **Q. If we were to try to fix the time of this 11:20:16**

8 **second phone call, one way in which we would fix the**

9 **time of this second phone call, in addition to**

10 **getting your telephone records, would be to find out**

11 **when this ABC interview took place, correct? Since**

12 **the phone call you're telling us came after the ABC**

13 **interview, that you convinced ABC not to air?**

14 A. No, I didn't state that. Let me be very 11:20:51

15 clear.

16 I found out from her that there was going 11:20:53

17 to be an ABC television interview. I don't think I

18 was aware of the fact that there was going to be a

19 television interview at that point.

20 I remember then getting a -- either a 11:21:05

21 phone call or e-mail from ABC informing me of that.

22 And that corroborated to my mind the fact that she

23 was telling me the truth about the ABC interview.

24 She also told me -- and this was 11:21:27

25 corroborated, she also told me that the television

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1 interview with ABC had to be postponed because her

2 husband, Virginia Roberts' husband, had beaten her

3 up so badly that she was hospitalized and that she

4 could not appear on television with the bruises

5 because she didn't want to have to explain that her

6 husband had beaten her up.

7 And I ultimately corroborated that 11:21:56

8 information as well by investigating the fact that

9 she, in fact, filed a complaint against her husband

10 and had been hospitalized.

11 So everything that Rebecca told me has 11:22:08

12 proved to be absolutely true and absolutely

13 corroborated. And, therefore, I believe it and

14 believe that your clients were engaged in what I

15 believe is an extortion plot against Leslie Wexner,

16 conspiracy to commit extortion in which I was a

17 victim, as well as Leslie Wexner, of being a victim.

18 **Q. Did you speak directly to Leslie Wexner or 11:22:36**

19 **only to his wife?**

20 A. Only to his wife and to his lawyers. 11:22:41

21 **Q. And you spoke by telephone? 11:22:42**

22 A. Yes. 11:22:43

23 **Q. Where were you and where was she? 11:22:44**

24 A. I called from, I think, New York and I 11:22:48

25 spoke to her about it. I told her what I said I

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1 said. She said what I said she said.

2 And then she said that her lawyers would 11:23:00

3 be in touch with me. And her lawyer then called me

4 and corroborated again that there had been contact

5 and eventually there was greater contact.

6 **Q. Contact by whom with whom? 11:23:15**

7 A. Contact by -- by Virginia Roberts' lawyer, 11:23:17

8 lawyers. I wasn't -- it wasn't clear at that point.

9 **Q. Which lawyer or lawyers? 11:23:26**

10 A. I wasn't clear at that point. They didn't 11:23:27

11 indicate to me which lawyer or lawyers --

12 **Q. Didn't you ask? 11:23:31**

13 A. -- contact. 11:23:32

14 **Q. Didn't you want to know, is this Bradley 11:23:32**

15 **Edwards or Professor Paul Cassell who is --**

16 A. I asked -- 11:23:35

17 **Q. -- making this -- 11:23:36**

18 A. I asked -- 11:23:36

19 MR. SCOTT: Objection, form. Go ahead. 11:23:37

20 A. I asked whether there was a letter and 11:23:39

21 they wouldn't show me a letter. I asked if there

22 were phone calls. They were a -- they wanted to be

23 discreet about how the contact had occurred. But

24 they told me that the contact had occurred.

25

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1 BY MR. SCAROLA: 11:23:52

2 **Q. But they wouldn't tell you who? 11:23:53**

3 A. They wouldn't show me any letter. 11:23:55

4 **Q. That's not my question. Did they tell 11:23:58**

5 **you -- did you ask who contacted Leslie Wexner?**

6 A. The first answer was Virginia Roberts' 11:24:07

7 lawyer.

8 I then subsequently learned that among 11:24:11

9 those who contacted Leslie Wexner's lawyers was

10 David Boies and Sigrid McCawley.

11 **Q. Not Bradley Edwards, correct? 11:24:24**

12 MR. SCOTT: Objection as to the form. 11:24:27

13 BY MR. SCAROLA: 11:24:28

14 **Q. Correct? 11:24:29**

15 A. I was not given the name Bradley Edwards 11:24:30

16 at that time. But was subsequently told by David

17 Boies that Bradley Edwards and Paul Cassell --

18 MS. McCAWLEY: I'm going to object to the 11:24:43

19 extent this reveals any conversations that

20 happened in the context of settlement

21 discussions.

22 MR. SCOTT: Okay. Note your objection. 11:24:48

23 Go ahead.

24 A. That I was ultimately told by David Boies 11:24:52

25 that he had done an extensive investigation of the

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1 allegations against Leslie Wexner and had concluded

2 that they were --

3 MS. McCAWLEY: Again, I'm going to object 11:25:05

4 to this has happened in the context of

5 settlement --

6 A. -- false. 11:25:07

7 MS. McCAWLEY: -- negotiations. I'm going 11:25:07

8 to move for sanctions if information is

9 revealed that happened in the context of

10 settlement discussions.

11 MR. SCOTT: I don't know whether -- I 11:25:12

12 don't believe there were settlement

13 discussions. But even if they weren't, they

14 would still be admissible.

15 A. Let me continue -- 11:25:21

16 MR. SCOTT: For discovery purposes. 11:25:22

17 A. -- that David Boies had done -- 11:25:23

18 MS. McCAWLEY: I disagree. I think we're 11:25:24

19 going to have to take this to the judge, then;

20 if we're going to reveal settlement

21 conversations in this conversation, then we

22 need to go to the judge on it.

23 MR. SCOTT: Whatever you need to do. 11:25:31

24 A. Let me continue the -- what he told me. 11:25:33

25 That David Boies had --

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1 MS. McCAWLEY: No, we're -- 11:25:35

2 MR. SIMPSON: No, no, no. 11:25:37

3 MS. McCAWLEY: -- going to discontinue. 11:25:38

4 We will contact the judge.

5 MR. SCAROLA: We'll move on to another 11:25:41

6 area and address that issue with the judge as

7 to whether or not a protective order is

8 appropriate.

9 A. Would you like to establish the foundation 11:25:46

10 for why it's not protected?

11 MR. SWEDER: Alan -- 11:25:50

12 MR. SCOTT: Alan, just let it alone. Let 11:25:51

13 it alone.

14 THE WITNESS: Okay. 11:25:53

15 BY MR. SCAROLA: 11:25:55

16 **Q. This second conversation you've told us 11:26:00**

17 **was conducted while you were in New York, correct?**

18 A. That's my best recollection. 11:26:06

19 **Q. The first conversation also conducted 11:26:09**

20 **while you were in New York?**

21 A. That's my best recollection. 11:26:12

22 **Q. Are you aware that New York is a one-party 11:26:17**

23 **consent state for purposes of permitting the**

24 **recording of communications, correct?**

25 MR. SCOTT: Objection. Do you know? 11:26:31

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1 A. I'm -- I think that's right, yeah. 11:26:34

2 BY MR. SCAROLA: 11:26:40

3 **Q. Okay. So you knew that these significant 11:26:41**

4 **conversations could have been recorded by you had**

5 **you chosen to record them, correct?**

6 A. I don't think I thought about that at the 11:26:52

7 time. I certainly -- I didn't think about that at

8 the time, no.

9 **Q. How many conversations in total did you 11:27:00**

10 **have with Rebecca and/or Michael when you were in**

11 **New York and had the legal right, had you chosen to,**

12 **not only to make contemporaneous notes but to**

13 **actually record the conversations?**

14 MR. SCOTT: Objection, asked and answered. 11:27:20

15 A. I think I was in New York for two of the 11:27:21

16 conversations. I think I was in Massachusetts for

17 several of the conversations. I don't think I was

18 in Florida. I think it was New York and

19 Massachusetts.

20 BY MR. SCAROLA: 11:27:33

21 **Q. Massachusetts is also a one-party consent 11:27:33**

22 **state, is it not?**

23 A. You don't know the law, sir, no. 11:27:36

24 **Q. It is not? 11:27:38**

25 A. No. 11:27:38

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1 **Q. Okay.** 11:27:39

2 A. It is clearly not. 11:27:39

3 **Q. Okay. So, you -- you recognize the 11:27:40**

4 **significant distinction between making the phone**

5 **call from New York and making the phone call from**

6 **Massachusetts because in New York you would be**

7 **permitted to -- excuse me, to record the phone call;**

8 **whereas, in Massachusetts you could not record it**

9 **without the consent of all parties involved?**

10 A. It never -- 11:27:58

11 MR. SCOTT: Objection, argumentative. 11:27:58

12 A. It never occurred to me. 11:28:00

13 BY MR. SCAROLA: 11:28:02

14 **Q. Never occurred to you? 11:28:02**

15 A. No. 11:28:03

16 **Q. Have we covered the entire content of the 11:28:09**

17 **second conversation?**

18 A. I think so, yes. I continued to ask her 11:28:25

19 if -- if I could use her -- if she was willing to

20 give me -- allow me to use her name. But that's

21 all. There were -- the substance of what she told

22 me I think I've covered fairly thoroughly, yes.

23 **Q. Did Michael ever tell you that Virginia 11:28:46**

24 **had said she never met you?**

25 MR. SCOTT: Read that back, will you, for 11:28:53

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1 me. Sorry.

2 (Requested portion read back.) 11:28:54

3 MR. SCOTT: Okay. Thank you. 11:29:00

4 A. Michael and I did not discuss the 11:29:04

5 substance of Virginia's conversations with Rebecca

6 because the conversations were between Virginia and

7 Rebecca. So there was no conversation about that.

8 BY MR. SCAROLA: 11:29:18

9 **Q. Did Rebecca ever tell you that Virginia 11:29:19**

10 **ever said that she had never met you?**

11 A. The implication was quite clear that she 11:29:25

12 had never mentioned me, that she didn't want to

13 mention me, and that the lawyers pressured her into

14 falsely accusing me of an act that simply never

15 occurred.

16 **Q. Okay. I'm not asking you about what you 11:29:44**

17 **implied from what was said.**

18 A. Inferred. 11:29:47

19 **Q. Inferred. 11:29:49**

20 A. Right. 11:29:50

21 **Q. Inferred from what was said. 11:29:51**

22 **What I am asking you is whether Rebecca 11:29:53**

23 **ever told you that Virginia said she had never met**

24 **you.**

25 MR. SCOTT: Objection, asked and answered. 11:30:03

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1 A. Not in those words. 11:30:04

2 BY MR. SCAROLA: 11:30:06

3 **Q. Did she say any words that conveyed that 11:30:06**

4 **message?**

5 A. Yes. 11:30:09

6 **Q. What words did she say? 11:30:10**

7 A. That she had never mentioned me 11:30:12

8 previously. And that she was pressured into

9 mentioning me by her lawyers and that certainly gave

10 rise to an inference on my part that the story -- an

11 inference that simply confirmed what I knew to be

12 the fact, that her allegations against me were

13 completely, totally and entirely made up out of

14 whole cloth.

15 **Q. Let's see if we can make sure that we're 11:30:37**

16 **understanding one another, sir.**

17 **Do you recognize that there's a 11:30:44**

18 **distinction between Virginia Roberts having met you,**

19 **having been sexually abused by you on multiple**

20 **occasions, but not wanting to name you, as opposed**

21 **to Virginia Roberts never having met you and never**

22 **having been sexually abused by you?**

23 MR. SCOTT: Objection -- 11:31:12

24 BY MR. SCAROLA: 11:31:12

25 **Q. Are those two things different in your 11:31:13**

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1 **mind?**

2 MR. SCOTT: Objection, argumentative and 11:31:15

3 compound.

4 A. Not in the context of this case. Because 11:31:17

5 Virginia Roberts said that she was going to seek

6 justice from everybody that had abused her. And if

7 she didn't want to name me, I think the inference is

8 inescapable that I was not among those people that

9 she had had any sexual contact with. So that was

10 certainly the inference I drew and I think it's an

11 inescapable inference.

12 BY MR. SCAROLA: 11:31:45

13 **Q. When did Virginia Roberts say she was 11:31:45**

14 **going to seek justice from everyone who had abused**

15 **her?**

16 A. In her -- in her depositions, in her 11:31:50

17 interviews with the media, certainly that's been a

18 common theme, that it was time that -- that Jeffrey

19 Epstein's friends who had abused her were brought to

20 justice and were not seen as above the law. Just go

21 back and check, you'll see there are repeated

22 references to that in her statements.

23 **Q. Which depositions? 11:32:17**

24 A. You'll have to check those. You know 11:32:18

25 those as well as I do.

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1 **Q. Well, I'm -- I'm sorry. My memory is not** 11:32:22
 2 **superb.**

3 A. Okay. So let me go over them. 11:32:26

4 **Q. And -- and I would like you to tell us** 11:32:29
 5 **based --**

6 MR. SCOTT: Objection. Please just ask 11:32:29
 7 questions, Counsel.

8 MR. SCAROLA: I am doing that. 11:32:32

9 BY MR. SCAROLA: 11:32:32

10 **Q. I would like you to tell us which** 11:32:33
 11 **depositions Virginia Roberts said -- in which**
 12 **depositions Virginia Roberts said, I am going to**
 13 **seek justice from everyone who abused me.**

14 A. My recollection is she said it on multiple 11:32:44
 15 occasions. She may have said it in her
 16 conversations -- in her telephone interview with
 17 Bradley Edwards and you. She may have said it in
 18 her interviews with various British media for which
 19 she was apparently paid. She may have said it in
 20 her two false affidavits that she filed in the
 21 federal court.

22 I'm not sure where she said it, but I'm 11:33:18
 23 completely confident that she said it.

24 **Q. What is a deposition?** 11:33:25

25 A. What we're having here now. 11:33:27

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1 **Q. Your testimony was that Virginia Roberts** 11:33:35
 2 **made these statements in depositions, plural. You**
 3 **then went on to talk about a telephone interview and**
 4 **interviews with the British media. Let's go back to**
 5 **my question, if we could.**

6 **When you made the statement under oath** 11:33:50
 7 **that Virginia Roberts said she was going to seek**
 8 **justice from everyone who abused her in depositions,**
 9 **which depositions were you talking about?**

10 A. I was using -- 11:34:05

11 MR. SCOTT: Objection, asked and answered. 11:34:06
 12 He's already provided --

13 A. I was using the term loosely, I apologize. 11:34:08
 14 I meant in statements, including statements under
 15 oath. So I withdraw the statement about
 16 depositions. But I insist that she made statements
 17 along those lines in her interviews of both formal
 18 and informal, both legal and to the media, so that I
 19 was entitled to draw the conclusion, the reasonable
 20 inference, that when she did not want to name me, it
 21 was because that I -- I never had any sexual or any
 22 other contact with her, which I know to be the
 23 truth. So that's an inference that I draw.

24 BY MR. SCAROLA: 11:34:47

25 **Q. Okay. And it is an inference that you** 11:34:47

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1 **drew, not something that either Rebecca or Michael**
 2 **ever told you, correct?**

3 A. I certainly believe that they believe 11:34:57
 4 that. But Rebecca was very careful about the words
 5 that she communicated to me and she told me
 6 precisely what it was that Virginia Roberts had told
 7 her and didn't go beyond that and didn't draw any --
 8 and didn't tell me any words that weren't, in fact,
 9 recited by Virginia Roberts.

10 So the words were she never mentioned you 11:35:24
 11 before all this stuff in the media, and she told me
 12 expressly that she did not want to include you in
 13 any of the allegations of sexual misconduct but her
 14 lawyers pressured her into doing it.

15 MR. SCOTT: I'd like to take a break in 11:35:47
 16 another five minutes or so. We've been going
 17 another hour. So where ever you think is good,
 18 Jack.

19 MR. SCAROLA: We're not quite there yet. 11:35:55

20 BY MR. SCAROLA: 11:35:58

21 **Q. Who are the people that Rebecca says** 11:35:58
 22 **Virginia had previously told her that Virginia was**
 23 **abused by?**

24 A. I never asked her that question. 11:36:10

25 **Q. Did you ask her was Les Wexner one of the** 11:36:14

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1 **people that abused Virginia?**

2 A. I told you I never asked her the question. 11:36:21

3 **Q. Are you aware that years before December** 11:36:48
 4 **of 2014, when the CVRA pleading was filed, that your**
 5 **name had come up repeatedly in connection with**
 6 **Jeffrey Epstein's abuse of minors, correct?**

7 MR. SCOTT: Objection, form, overly broad. 11:37:16

8 A. Let me answer that question. I am aware 11:37:17
 9 that never before 2014, end of December, was it
 10 ever, ever alleged that I had acted in any way
 11 inappropriately with regard to Virginia Roberts,
 12 that I ever touched her, that I ever met her, that I
 13 had ever been with her. I was completely aware of
 14 that. There had never been any allegation.

15 She claims under oath that she told you 11:37:48
 16 that secretly in 2011, but you have produced no
 17 notes of any such conversation. You, of course, are
 18 a witness to this allegation and will be deposed as
 19 a witness to this allegation. I believe it is an
 20 entirely false allegation that she told you in 2011
 21 that she had had any sexual contact with me. I
 22 think she's lying through her teeth when she says
 23 that. And I doubt that your notes will reveal any
 24 such information.

25 But if she did tell you that, she would be 11:38:24

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1 absolutely, categorically lying. So I am completely
 2 aware that never, until the lies were put in a legal
 3 pleading at the end of December 2014, it was never
 4 alleged that I had any sexual contact with Virginia
 5 Roberts.
 6 I know that it was alleged that I was a 11:38:46
 7 witness to Jeffrey Epstein's alleged abuse and that
 8 was false. I was never a witness to any of Jeffrey
 9 Epstein's sexual abuse. And I wrote that to you,
 10 something that you have falsely denied. And I stand
 11 on the record. The record is clear that I have
 12 categorically denied I was ever a witness to any
 13 abuse, that I ever saw Jeffrey Epstein abusing
 14 anybody.
 15 And -- and the very idea that I would 11:39:18
 16 stand and talk to Jeffrey Epstein while he was
 17 receiving oral sex from Virginia Roberts, which she
 18 swore to under oath, is so outrageous, so
 19 preposterous, that even David Boies said he couldn't
 20 believe it was true.
 21 MS. McCAWLEY: I object. I object. I'm 11:39:40
 22 not going to allow you to reveal any
 23 conversations that happened in the context of a
 24 settlement discussion.
 25 THE WITNESS: Does she have standing? 11:39:46

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1 MS. McCAWLEY: I have a standing objection 11:39:47
 2 and, I'm objecting again. I'm not going to --
 3 THE WITNESS: No, no, no. Does she have 11:39:49
 4 standing in this deposition?
 5 MR. SCOTT: Let's take a break for a 11:39:51
 6 minute, okay?
 7 THE WITNESS: I'm not sure she has 11:39:54
 8 standing.
 9 MR. SCAROLA: Are we finished with the 11:39:57
 10 speech?
 11 MR. SCOTT: No. If he -- 11:39:58
 12 MR. SCAROLA: I'd like him to finish the 11:39:59
 13 speech so that we can get to my question and
 14 then we can take a break.
 15 A. So the question -- the answer to your 11:40:02
 16 question is --
 17 MR. SIMPSON: Wait a minute. Wait a 11:40:04
 18 minute. Wait a minute. Please don't disclose
 19 something that she has a right to raise that
 20 objection if she wants to.
 21 MR. SCOTT: Exactly. 11:40:13
 22 THE WITNESS: Okay. 11:40:14
 23 MR. SCOTT: Ask your question. 11:40:17
 24 MR. SWEDER: Maybe you want to read back 11:40:20
 25 the last couple of sentences.

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1 MR. SCAROLA: No, how about just reading 11:40:22
 2 back the last question and maybe we can get an
 3 answer to the question.
 4 MR. SCOTT: Again, I move to strike your 11:40:27
 5 comments, Counsel, because it's inappropriate
 6 and you're too good a lawyer to know that
 7 that's not true --
 8 MR. SCAROLA: Nothing inappropriate about 11:40:33
 9 my insisting upon an answer to the question
 10 that I asked instead of a speech.
 11 MR. SCOTT: Well, you know, he's trying to 11:40:37
 12 answer your question to the best of his
 13 ability. Counsel objected to it. I wanted to
 14 take a break to make sure that we explained to
 15 him the position so that we didn't have a
 16 problem, and I was trying to protect everybody
 17 in this room. But if you want to proceed, we
 18 can do it.
 19 MR. SCAROLA: Well, if we simply answer 11:40:52
 20 the questions that are asked, there won't be a
 21 problem.
 22 MR. SCOTT: Well, I guess everybody -- you 11:40:59
 23 can characterize it one way, I can characterize
 24 it another, that he's doing the best he can to
 25 answer your questions.

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1 MR. SCAROLA: And ultimately Judge Lynch 11:41:05
 2 will make that determination.
 3 MR. SCOTT: Absolutely. Sobeit. 11:41:08
 4 MR. SCAROLA: So read back the last 11:41:08
 5 question, if you would, please. We'll get a --
 6 hopefully get an answer to that and then we can
 7 take a break.
 8 MR. SCOTT: Again, I object to the 11:41:14
 9 comments, Counsel.
 10 (Requested portion read back as follows:) 11:41:16
 11 THE COURT REPORTER: "Are you aware that 11:41:39
 12 years before December of 2014, when the CVRA
 13 pleading was filed, that your name had come up
 14 repeatedly in connection with Jeffrey Epstein's
 15 abuse of minors, correct?"
 16 MR. SCOTT: Objection, asked and answered 11:41:41
 17 several times. Go ahead.
 18 A. I have answered that question. If you 11:41:45
 19 would like, I will answer it again.
 20 BY MR. SCAROLA: 11:41:50
 21 **Q. I would like an answer to that question. 11:41:50**
 22 A. I am aware -- 11:41:51
 23 **Q. Seems to me it calls for yes or no 11:41:52**
 24 **response.**
 25 A. It does not -- 11:41:54

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1 **Q. Yes, I am aware that my name is --** 11:41:55
 2 MR. SCOTT: Again, I object to -- I'm not 11:41:57
 3 trying to get into a fight with you, Jack, but
 4 I object to the comments, you know. Really
 5 just let him answer the question.
 6 MR. SCAROLA: You and I don't need to 11:42:02
 7 fight.
 8 MR. SCOTT: I agree. 11:42:04
 9 A. The word "in connection" is what requires 11:42:05
 10 a longer answer. Yes, I am aware that it was
 11 falsely alleged by you that multiple witnesses had
 12 placed me at places and scenes where multiple
 13 victims had been abused by Jeffrey Epstein. That
 14 statement by you, Mr. Scarola, was a false
 15 statement. It is not true that multiple witnesses
 16 have said that. And you misstated that.
 17 I am aware that there were false 11:42:35
 18 allegations that I was a witness but never a
 19 participant in any improper conduct. And I
 20 categorically responded in letters to you, and to
 21 Mr. Edwards, I think, that there was no truth to
 22 that. That if any witness had so testified, they
 23 would be committing perjury.
 24 MR. SCAROLA: You have requested a break. 11:43:04
 25 MR. SCOTT: Let's do it. Good point. 11:43:06

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1 VIDEOGRAPHER: Going off the record. The 11:43:07
 2 time is approximately 11:43 a.m.
 3 (Recess was held from 11:43 a.m. until 12:02 p.m.) 11:43:11
 4 VIDEOGRAPHER: Going back on the record. 12:02:12
 5 The time is approximately 12:02 p.m.
 6 BY MR. SCAROLA: 12:02:16
 7 **Q. Have we completely covered the content of** 12:02:17
 8 **phone call number 2?**
 9 A. To my best of my recollection, yes. 12:02:22
 10 **Q. Okay. Let's go to the very next** 12:02:25
 11 **communication between you and either Rebecca or**
 12 **Michael.**
 13 A. My recollection is that I asked them if 12:02:37
 14 they had anything else that they were aware of, any
 15 other information, I asked her whether she had been
 16 in touch with Virginia Roberts. I think in the
 17 third conversation we also talked about the charity.
 18 And she agreed.
 19 **Q. I'm sorry, I need to stop you for a just a** 12:03:01
 20 **moment. Who contacted whom and when?**
 21 A. I think I contacted them. Normally the 12:03:08
 22 procedure was I speak to Michael, he would pick up
 23 the phone, I only had his number. I only had his
 24 phone number, not hers.
 25 **Q. So this was the third phone call initiated** 12:03:18

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1 **by you?**
 2 A. By me to the best of my recollection. 12:03:22
 3 I called him and he would always be the 12:03:23
 4 kind of gatekeeper and often she was putting the
 5 babies to sleep, and sometimes she couldn't come to
 6 the phone. The third conversation, substantive
 7 conversation -- there may have been conversations
 8 where I called and Michael wasn't there or I left a
 9 message, or where Michael was there but she was
 10 putting the babies to sleep and either she said they
 11 would -- either he said they would call me back or I
 12 called them back.
 13 But the third substantive conversation, to 12:03:48
 14 the best --
 15 **Q. Where were you?** 12:03:51
 16 A. Huh? 12:03:52
 17 **Q. Where were you when you --** 12:03:53
 18 A. Probably -- 12:03:54
 19 **Q. -- initiated this call?** 12:03:55
 20 A. Probably in Massachusetts at this point. 12:03:55
 21 And then -- we discussed the charity. And 12:04:04
 22 I think it was called VR, which is her initials,
 23 Virginia Roberts, and also it stood for something, I
 24 don't know, Victims Rights or something like that.
 25 And she said that the lawyers had contributed

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1 \$80,000 of their own money to start the charity.
 2 She didn't indicate which lawyers. But the lawyers
 3 had contributed \$80,000 of their own money to start
 4 the charity and that they were going to fund the
 5 charity by contribution from Leslie -- from the man
 6 from Columbus who owned Victoria's Secret and they
 7 expected a very substantial contribution.
 8 They also said that -- 12:05:02
 9 **Q. I'm sorry, but "they" is not helpful to** 12:05:04
 10 **me.**
 11 A. She -- when I say "they" -- when I talk 12:05:07
 12 about the substance, I'm always talking about her.
 13 I never had any conversations about the substance
 14 with him.
 15 She said that they were hoping to fund the 12:05:17
 16 charity by substantial contribution from Leslie
 17 Wexner and that they thought that by getting on
 18 television, they would increase the chances of
 19 raising this money from Leslie Wexner.
 20 And that she thought they had already made 12:05:37
 21 contact with Wexner and that they had already
 22 made -- with the man from Columbus, and they had
 23 already made contact with ABC. But I don't think
 24 she knew at that point whether the actual interviews
 25 did or did not occur. Oh, she did tell me that she

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1 went to New York at some point for the interviews.

2 **Q. "She" who? 12:06:04**

3 A. She, Rebecca, told me that Virginia had 12:06:05

4 gone to New York and so she assumed that she was

5 into New York for the interviews.

6 **Q. So this was a conversation that you 12:06:17**

7 **assumed took place after Virginia Roberts was**

8 **interviewed in New York?**

9 A. I don't know. I don't know. 12:06:25

10 **Q. That's what you were told? 12:06:26**

11 A. No. I was told that she was in New York. 12:06:27

12 I'm just giving you the facts, sir.

13 **Q. Okay. Any other information exchanged 12:06:31**

14 **between you and Rebecca and/or Michael during the**

15 **third conversation?**

16 A. I can't recall during the third 12:06:44

17 conversation any further information that was

18 exchanged, no.

19 **Q. Did you place that phone call on a 12:06:50**

20 **landline or cell phone?**

21 A. I don't remember. 12:06:54

22 **Q. Do you have a landline in New York? 12:06:58**

23 A. I do. 12:07:00

24 **Q. Do you have a landline in Massachusetts? 12:07:01**

25 A. Yes. 12:07:05

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1 **Q. What's the next communication that you had 12:07:07**

2 **with Rebecca and/or Michael? When did it occur?**

3 A. I don't recall. I don't recall. I know 12:07:16

4 we had further communications. They were mostly

5 repetitions and I have no specific recollection of

6 when -- when they occurred. And I was constantly

7 saying to her, can I -- you know, are you feeling

8 comfortable about being public with this? And she

9 kept saying no.

10 **Q. Were there any more substantive 12:07:47**

11 **communications that occurred between you and Rebecca**

12 **and/or Michael?**

13 A. I would say that none that gave me new 12:07:54

14 information. I would constantly ask them, you know,

15 to reiterate has anything changed, have you changed

16 your mind, have you remembered anything new. But

17 basically what I've told you was the substance of

18 the information: A, that she didn't ever mention

19 me; B, that she was pressured into mentioning me by

20 her lawyers; C, that she was going to raise a

21 billion dollars or half of the net worth of the guy

22 from Columbus, Ohio.

23 And the next, that she was going to be 12:08:25

24 interviewed by ABC in an effort to make it clear

25 that she had, A, credibility, that ABC would give

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1 her credibility, and that that would help her in her

2 efforts to obtain money from her -- I think at some

3 point she also mentioned that she would go after

4 other people that she hadn't yet named in an effort

5 to obtain money from them as well.

6 **Q. Did you ever directly ask Rebecca if 12:08:58**

7 **Virginia Roberts had admitted that she had never met**

8 **you?**

9 A. No. 12:09:08

10 **Q. Did you ever -- well, why not? Why didn't 12:09:09**

11 **you ask that question?**

12 A. I just -- 12:09:13

13 MR. SCOTT: Objection. Go ahead. 12:09:15

14 A. I just wanted to get her to tell me what 12:09:15

15 she was going to tell me. I was very satisfied with

16 her answers. There were a lot of questions I could

17 have asked. I had to treat her very gently. I

18 wanted to keep her on the phone for as short a

19 period of time as possible. I didn't want to be

20 perceived as in any way harassing her. And so I

21 didn't ask that question directly.

22 BY MR. SCAROLA: 12:09:41

23 **Q. Well, certainly one of the most 12:09:41**

24 **significant questions that you could have asked her**

25 **was: Did Virginia ever admit she never met me?**

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1 **That would be pretty significant, wouldn't 12:09:52**

2 **it?**

3 MR. SCOTT: Objection, form, 12:09:55

4 argumentative.

5 A. What I asked her was to please recall 12:09:57

6 everything that Virginia Roberts had said to her.

7 BY MR. SCAROLA: 12:10:00

8 **Q. Yes, sir. But that's not my question to 12:10:00**

9 **you.**

10 A. I didn't -- 12:10:02

11 **Q. It would have been very significant had 12:10:03**

12 **Virginia Roberts ever said, I never met Alan**

13 **Dershowitz, right?**

14 MR. SCOTT: Objection, argumentative. Go 12:10:10

15 ahead.

16 A. It wouldn't have been significant to me 12:10:11

17 because I know that Virginia Roberts never met Alan

18 Dershowitz. It would have been significant to me if

19 she could have so testified. But I didn't want to

20 in any way turn off her as a source of information.

21 And so I didn't ask her very many questions at all.

22 I wanted her to tell me her best recollection

23 unprompted and unquestioned.

24 I didn't want to subject her to a series 12:10:37

25 of examination questions. I wanted her to tell

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1 me -- for example, the whole thing about the guy
 2 from Columbus, I didn't know anything about that.
 3 She just said that in the course of conversing with
 4 me and led me to conclude that there was an
 5 extortion plot.
 6 I had actually believed there was an 12:10:52
 7 extortion plot from the very beginning and said
 8 that. But I had no real knowledge about who the
 9 ultimate object of the extortion plot was until I
 10 was able to confirm with Leslie Wexner's people
 11 that, in fact, overtures been made to him at about
 12 the same time as my name was publicly and falsely
 13 revealed. So it all fit together.
 14 And my own view is that a prosecutor would 12:11:21
 15 look very, very harshly at the sequence of events
 16 that occurred in this case and might welcome the
 17 conclusion that there was a criminal extortion plot.
 18 Which is my belief.
 19 BY MR. SCAROLA: 12:11:37
 20 **Q. Well, we know you never made a Bar 12:11:37**
 21 **complaint.**
 22 A. Huh-huh. 12:11:39
 23 **Q. Did you ever file a criminal complaint 12:11:39**
 24 **against any of these extortionists or perjury**
 25 **suborners?**

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1 A. We actually talked about that. And -- 12:11:47
 2 **Q. Who's the "we"?** 12:11:50
 3 MR. SIMPSON: Don't disclose any -- 12:11:53
 4 THE WITNESS: Okay -- 12:11:53
 5 MR. SIMPSON: -- lawyer-client -- 12:11:54
 6 A. I had conversations about that with 12:11:55
 7 appropriate persons, yes. And I discussed it with
 8 Wexner's lawyers.
 9 BY MR. SCAROLA: 12:12:07
 10 **Q. Are you answering yes to my question that 12:12:08**
 11 **you have filed a criminal complaint?**
 12 A. Not yet. 12:12:12
 13 **Q. Okay. So it has been ten months since you 12:12:14**
 14 **allegedly became aware of that suborning of perjury**
 15 **and some eight months since your allegedly having**
 16 **become aware of the extortion plot, but you have**
 17 **filed no criminal complaints against anyone,**
 18 **correct?**
 19 A. To answer that question requires me to 12:12:40
 20 disclose conversations I had with David Boies. I
 21 would love to answer that question.
 22 **Q. No, sir, it does not. 12:12:48**
 23 A. Yes, it does. 12:12:49
 24 MR. SCOTT: Whoa, you can't -- how can you 12:12:49
 25 say --

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1 BY MR. SCAROLA: 12:12:51
 2 **Q. Whether you filed a criminal complaint or 12:12:51**
 3 **not.**
 4 A. Yes, it does. 12:12:52
 5 MR. SCOTT: Please, Jack, he can't say 12:12:53
 6 that.
 7 A. It does involve conversation I had with 12:12:54
 8 David Boies.
 9 BY MR. SCAROLA: 12:12:57
 10 **Q. Well, in that case, in light of the fact 12:12:57**
 11 **that that is a matter that will be addressed by the**
 12 **Court, we'll save that question for another time.**
 13 A. I'm anxious to answer it. 12:13:05
 14 **Q. And I'm anxious to get an answer. 12:13:09**
 15 A. Well, I hope we can agree I should be able 12:13:10
 16 to answer it.
 17 **Q. Have we exhausted your recollection of the 12:13:20**
 18 **details of conversations that you had with Rebecca**
 19 **and Michael?**
 20 A. About the substance of what she told me. 12:13:27
 21 There were many conversations involving would she do
 22 this, would she do that. But the conversations, the
 23 substance we've exhausted.
 24 **Q. Okay. Well -- 12:13:40**
 25 A. That is A, B, C, D, E, as I said, those -- 12:13:40

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1 those are what I've told you is the substance, the
 2 details of what she said. And she said nothing
 3 different or new, to my recollection, in any of the
 4 brief subsequent conversations that we may have had.
 5 **Q. Which phone call was it when she finally 12:14:01**
 6 **disclosed her full name?**
 7 A. Not the first. It was either the second 12:14:19
 8 or the third conversation. Probably the second
 9 conversation. First I got his name and I checked
 10 him out, checked on Google to make sure that he was
 11 who he says he was and lived where he lived. And
 12 then she gave me her name.
 13 **Q. So, when you say you checked Michael out, 12:14:39**
 14 **what you did is you Googled him; is that right?**
 15 A. I just Googled him to see that he lived in 12:14:43
 16 the place where he lived and was --
 17 **Q. Okay. Did you do any other background 12:14:46**
 18 **information?**
 19 A. Well, I was -- no, I was obviously 12:14:49
 20 concerned that maybe I was being set up by your
 21 clients. And so I wanted to be sure that this
 22 wasn't a setup, that this was an honorable person,
 23 which is why I asked my wife also to listen to
 24 the -- I think it was the second conversation. And
 25 she concluded that she sounded completely honest,

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1 trustworthy and -- and anxious just to say exactly
 2 and precisely what happened. And so I became
 3 convinced that she was authentic and not -- not a
 4 setup.

5 **Q. Okay. So, in order to investigate 12:15:26**
 6 **Michael, you Googled him but did nothing else?**

7 A. That's all. To my recollection, that's 12:15:32
 8 all I did is Google him.

9 **Q. But you also relied upon both your and 12:15:35**
 10 **your wife's personal assessment of the credibility**
 11 **of these people; is that right?**

12 A. Absolutely. That's right, yes. 12:15:44

13 **Q. A skill that you've developed over the 12:15:46**
 14 **course of your years of practice, right?**

15 MR. SCOTT: Objection. Go ahead. 12:15:52

16 A. I just relied on it. I mean, I'm not -- I 12:15:52
 17 don't know how good I am at it. But some people are
 18 very good liars. But I believed her. That was my
 19 judgment.

20 My wife, who is a, you know, Ph.D. 12:16:06
 21 neuropsychologist with a lot of experience, we all
 22 thought she sounded -- we both thought she sounded
 23 incredibly truthful.

24 BY MR. SCAROLA: 12:16:16

25 **Q. But was it all or was it both? 12:16:17**

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1 A. Just both, just the two of us. 12:16:19

2 **Q. You and your wife? 12:16:20**

3 A. Just me and my wife, yeah. 12:16:21

4 **Q. So -- 12:16:24**

5 A. My wife is southern, so I'm used to the 12:16:24
 6 phrase "all."

7 **Q. You relied upon your personal assessment 12:16:27**
 8 **of --**

9 A. That's right. 12:16:30

10 **Q. -- Rebecca's credibility? 12:16:30**

11 A. That's right. 12:16:32

12 **Q. And you relied upon your wife's assessment 12:16:33**
 13 **of Rebecca's credibility?**

14 A. That's right. 12:16:37

15 **Q. And did you do any further investigation 12:16:38**
 16 **of her?**

17 A. No. Well, yes, of course, I corroborated 12:16:44
 18 everything she said by talking to Leslie Wexner's
 19 wife, talking to Leslie Wexner's lawyers, talking to
 20 ABC, and finding out that everything she said to me
 21 was absolutely true, yes.

22 **Q. Well, the one thing that you didn't 12:17:01**
 23 **corroborate was anything that Virginia Roberts**
 24 **allegedly said to her about you?**

25 A. Of course I did. Of course I did. 12:17:10

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1 **Q. How did you do that? 12:17:12**

2 A. I corroborated what Virginia Roberts said, 12:17:13
 3 that she was -- was going to sue Leslie -- she was
 4 going to go after Leslie Wexner to try to get a lot
 5 of money --

6 **Q. Let me make sure you understand my 12:17:26**
 7 **question.**

8 A. Yeah. Yeah. 12:17:27

9 **Q. Okay? You have corroborated surrounding 12:17:28**
 10 **circumstances --**

11 A. Right. 12:17:36

12 **Q. -- related to you by Rebecca? 12:17:36**

13 A. Right. Right. 12:17:40

14 **Q. You did not corroborate anything that 12:17:41**
 15 **Rebecca told you about what Virginia Roberts said**
 16 **regarding you personally, correct?**

17 A. Of course I did. No, of course I did. I 12:17:53
 18 corroborated it by my absolute firm and complete and
 19 unequivocal knowledge that your clients' allegations
 20 against me and Virginia Roberts' allegations against
 21 me were totally and completely false and completely
 22 made up. So I knew that. That knowledge
 23 corroborated her statements.

24 **Q. Well, the statement that you have related 12:18:14**
 25 **is that Rebecca said Virginia Roberts was pressured**

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1 **into naming you --**

2 A. There were -- 12:18:24

3 **Q. -- correct? 12:18:25**

4 A. No, there were two statements. One that 12:18:26
 5 Virginia Roberts never mentioned me in connection
 6 with anybody that she had any sexual contact with.
 7 I knew that was true. Your clients know that that
 8 is false. And me knowing it's true served to
 9 corroborate that statement by her.

10 **Q. How could you possibly know whether 12:18:45**
 11 **Virginia Roberts ever mentioned your name before**
 12 **December of 2014?**

13 A. Because it was false and because she would 12:18:54
 14 not have mentioned my name until her lawyers
 15 pressured her into doing it because I had no contact
 16 with her.

17 **Q. Do you have a copy of the statement that 12:19:11**
 18 **Virginia Roberts made to the FBI?**

19 A. I don't have it here, no. 12:19:16

20 **Q. Have you seen it? 12:19:17**

21 A. Her statement to the FBI? 12:19:20

22 **Q. Yes. 12:19:22**

23 A. No, but I do know that she never told the 12:19:23
 24 FBI anything about me whatsoever. Because I was
 25 told that by Jeffrey Sloman, who was the assistant

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1 United States attorney in charge of this case.

2 Jeffrey Sloman said he was prepared to file a sworn

3 affidavit that my name never came up, period, during

4 any investigation whatsoever, and that if my name

5 had in any way come up, I would not have been

6 allowed to participate in the negotiations because I

7 would have had a conflict of interest.

8 Jeffrey Sloman said that to me and to 12:19:55

9 other people and tried very hard to get the Justice

10 Department to allow him to file an affidavit

11 asserting that. So I know it's true. And I know

12 it's false what you're alleging; namely, that she

13 said she had sex with me or implying that to the

14 FBI.

15 If she did, she's committed yet an 12:20:14

16 additional crime, 1001, by lying to an FBI agent,

17 which if she did I'd like to know about that because

18 I'd like to then file a formal complaint with the

19 FBI about that, or with the Justice Department.

20 I recommend that you speak to Jeffrey 12:20:33

21 Sloman.

22 **Q. You know that Virginia Roberts is not the 12:20:35**

23 **only person who has sworn under oath that you were**

24 **present at Jeffrey Epstein's Palm Beach home with**

25 **young girls, right?**

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1 A. No. 12:20:54

2 **Q. You don't know that? 12:20:55**

3 A. No. I know that -- 12:20:57

4 **Q. Well, that's fine. You've answered my 12:20:59**

5 **question. That's not something you know?**

6 A. A, I was not present in Jeffrey Epstein's 12:21:02

7 home with any underage young women, period. Never,

8 ever under any circumstances.

9 B, I am not aware that anyone has sworn 12:21:12

10 under oath that I was there during the relevant

11 periods of time, which is a three-year period

12 between the summer of 1999 and the summer of 2002.

13 Because I was never -- as far as I know, I was never

14 in Jeffrey Epstein's home during that period of

15 time, period.

16 **Q. I want to go back to the Ashes, if I 12:21:36**

17 **could. Joanne Ashe is not a lawyer, is she?**

18 A. Joanne Ashe is not a lawyer, no. 12:21:42

19 **Q. And is Alexi Ashe a lawyer? 12:21:44**

20 A. Yes. 12:21:46

21 **Q. Has Alexi Ashe ever been your lawyer? 12:21:49**

22 A. I have discussed the case with Alexi Ashe. 12:21:53

23 She is a full-time sex trafficking prosecutor whose

24 whole career has been going after sex traffickers in

25 the Brooklyn District Attorney's office and I have

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1 discussed my case with her.

2 **Q. Has Alexi Ashe ever been your lawyer? 12:22:09**

3 A. I would say not, no. 12:22:11

4 **Q. Beginning approximately January 3 or 4 of 12:22:23**

5 **2015, you began a mass media campaign battle against**

6 **Bradley Edwards and Professor Paul Cassell alleging**

7 **that they were sleazy, unethical lawyers who**

8 **fabricated false charges against you, correct?**

9 A. That's a false -- 12:22:46

10 MR. SCOTT: Objection, argumentative, mass 12:22:46

11 media, et cetera.

12 A. That's a false statement. 12:22:46

13 I did not begin. It was your clients who 12:22:49

14 began it. Your clients began it by filing false

15 statements in a federal court which the judge struck

16 and sanctioned them for as being irrelevant and

17 pertinent and he used other language.

18 They began it. It is my belief that they 12:23:10

19 began it in order to get massive press attention to

20 it. And my -- my responses were when the press

21 called me, the press called me immediately and asked

22 me for my reaction. I was totally shocked that any

23 lawyer would make these kinds of outrageous

24 career-destroying allegations without even calling

25 me and asking me if I would deny it or have any

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1 evidence to provide for them.

2 And when I was called by the media, I did 12:23:47

3 what you would do, Mr. Scarola, or what your clients

4 would do, I defended myself. What any American

5 would do under the First Amendment, I categorically

6 denied career-destroying false statements and I told

7 the truth, which is what the United States

8 Constitution is all about and why we fought for

9 liberty. Yes, I told the truth to the media.

10 BY MR. SCAROLA: 12:24:10

11 **Q. You engaged in a mass media campaign to 12:24:11**

12 **convince the world that Bradley Edwards and**

13 **Professor Paul Cassell were unethical lawyers who**

14 **had fabricated false charges against you, correct?**

15 MR. SCOTT: Objection, argumentative. 12:24:30

16 A. No, that's not correct. I responded to 12:24:31

17 press inquiries by telling the truth. My goal was

18 to let the world know that Virginia Roberts'

19 allegations against me were totally false. These

20 stories appeared, as far as I can tell, in every

21 single newspaper in the world and on every media,

22 which was part of their plot and the plan of your

23 clients, which is why they absurdly mentioned

24 Prince Andrew, claiming in the most absurd way --

25 that they mentioned him because he was trying to

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1 lobby prosecutors to get a reduced sentence for
 2 Jeffrey Epstein, they obviously put Prince Andrew in
 3 there in order to get massive publicity around the
 4 world. And every media in the world practically
 5 called me from the BBC, to CBS, to ABC, to CNN and I
 6 responded to lies with the truth.
 7 BY MR. SCAROLA: 12:25:26
 8 **Q. And the truth that you attempted to convey 12:25:27**
 9 **was that Bradley Edwards and Professor Paul Cassell**
 10 **were unethical lawyers who fabricated false charges**
 11 **against you, right?**
 12 A. The truth -- 12:25:42
 13 MR. SCOTT: Objection, form. 12:25:43
 14 A. The truth that I intended to convey was 12:25:44
 15 that the charges against me were false and
 16 fabricated, that I never had any sexual contact --
 17 BY MR. SCAROLA: 12:25:52
 18 **Q. Fabricated by whom, sir? 12:25:52**
 19 A. Please don't interrupt me. 12:25:54
 20 MR. SCOTT: Objection, interrupting. 12:25:55
 21 BY MR. SCAROLA: 12:25:55
 22 **Q. Please answer the question. 12:25:55**
 23 A. Please don't interrupt -- 12:25:56
 24 MR. SCOTT: He's answering them. You may 12:25:57
 25 not like the answer, but he's answering them.

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1 A. Now you've -- you've made me lose my train 12:26:02
 2 of thought, so --
 3 MR. SCOTT: Can you read the question back 12:26:05
 4 and the -- read the question back and his
 5 answers, please.
 6 (Requested portion read back.) 12:26:08
 7 THE COURT REPORTER: The question was: 12:26:08
 8 "And the truth that you attempted to convey was
 9 that Bradley Edwards and Professor Paul Cassell
 10 were unethical lawyers who fabricated false
 11 charges against you, right?"
 12 And the answer was: "The truth that I 12:26:08
 13 intended to convey was that the charges against
 14 me were false and fabricated, that I never had
 15 any sexual contact" -- and then the question
 16 was -- the answer was interrupted.
 17 A. Okay. Let me continue. That I never had 12:26:42
 18 any sexual contact with Virginia Roberts because
 19 Professor Cassell insisted on conveying to the
 20 public that he was a former judge and that he was a
 21 professor and that he was using, improperly in my
 22 view, the stationery and name of his university to
 23 add credibility to his claims, I felt that it was
 24 imperative for me to indicate that he was engaging
 25 in improper and unethical conduct.

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1 It would have been improper for me to have 12:27:18
 2 allowed his use of his credibility as a former
 3 federal judge, as a professor who uses, misuses his
 4 university imprimatur, it was very important for me
 5 to attack the credibility of the messengers of the
 6 false information.
 7 And it was important for me to also remind 12:27:43
 8 the public that Bradley Edwards was a partner of
 9 Rothstein, a man who is spending 50 years in jail
 10 for fraudulently creating a Ponzi scheme to sell
 11 Jeffrey Epstein cases that didn't exist. Yes, it
 12 was very important for me to indicate the back --
 13 the real backgrounds of these lawyers and to make
 14 sure that the public didn't believe that because
 15 they were credible, their story must be credible.
 16 In fact, one of the first questions that I 12:28:22
 17 was asked repeatedly by the media is: Why would a
 18 former federal judge level a false charge against
 19 you? Why would a distinguished personal injury
 20 lawyer level a false charge against you?
 21 And it was important for me to indicate 12:28:36
 22 why they would, that they were trying to do it for
 23 crass financial reasons, they were trying to do it
 24 to open up a non-prosecution agreement, they were
 25 trying to do it for reasons that were improper.

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1 So, yes, I did -- you know, Mr. Edwards, 12:28:55
 2 your client, is shaking his head, but when he's
 3 deposed under oath, he's not going to be able to
 4 simply shake his head. He's going to have to answer
 5 specific and direct questions.
 6 BY MR. SCAROLA: 12:29:11
 7 **Q. Let me try my question. 12:29:12**
 8 **Did you charge Bradley Edwards and 12:29:16**
 9 **Professor Paul Cassell in your mass media**
 10 **appearances with fabricating false charges against**
 11 **you?**
 12 MR. SCOTT: Objection, form. 12:29:29
 13 A. My media appearances were largely in 12:29:33
 14 response to media requests of me. I did not conduct
 15 a media campaign. The object of my speaking to the
 16 media was to respond to their questions. Their
 17 questions were, number 1, did you ever have any
 18 sexual contact with Virginia Roberts? And I
 19 unequivocally stated no.
 20 I stated that I knew there were no videos 12:30:01
 21 or photographs because the event didn't occur. I
 22 stated that I would submit a sworn affidavit, which
 23 in effect waived the statute of limitations. I
 24 stated unequivocally that I was innocent of those
 25 false charges.

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1 I was then asked by the media, well, why 12:30:29
 2 would somebody who is a former federal judge and
 3 professor at a law school make these false charges?
 4 I responded to those questions. Why would somebody
 5 like a distinguished personal injury lawyer make
 6 those false charges? And I responded to those
 7 questions. And everything I said was the truth as I
 8 believed it to be at the time.
 9 BY MR. SCAROLA: 12:30:55
 10 **Q. Do you remember the question that was 12:30:57**
 11 **asked of you?**
 12 A. Yes, I've answered it. 12:30:58
 13 **Q. What was the question? 12:31:00**
 14 A. As part of massive media campaign, did I 12:31:03
 15 charge your clients with deliberately falsifying a
 16 charge against me, and my answer satisfies that
 17 question.
 18 **Q. No, I don't think it does. Can you tell 12:31:18**
 19 **us whether that's what you did, did you charge --**
 20 A. I just did. 12:31:22
 21 **Q. -- them with having intentionally 12:31:23**
 22 **fabricated false charges against you?**
 23 A. I believe that they intentionally 12:31:28
 24 fabricated false evidence against me. I believe
 25 that they pressured their client into fabricating

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1 false evidence against me. I believe that they
 2 helped to draft a perjurious affidavit that was
 3 filed in court, after they knew that I said I could
 4 prove that I couldn't have been there four of the
 5 five places that the alleged acts could have
 6 occurred.
 7 I believe that when they recently sought 12:31:59
 8 to submit an additional claim repeating these
 9 charges into the federal court, that they did it
 10 knowing full well that these charges were false.
 11 That's my belief, yes.
 12 **Q. Are you aware that your lawyers filed a 12:32:14**
 13 **pleading on your behalf in this case with the title**
 14 **Defendant Alan M. Dershowitz's Answer to the**
 15 **Complaint and Counterclaim?**
 16 A. I'm not aware of that. 12:32:23
 17 **Q. Pardon me? 12:32:24**
 18 A. I'm not aware of the title of any legal 12:32:25
 19 pleadings.
 20 **Q. Do you know that an answer has been filed 12:32:28**
 21 **to the defamation action that has been brought**
 22 **against you?**
 23 A. Of course. I mean, I'm sure there's been 12:32:34
 24 a legal answer prepared. Of course, that's what
 25 lawyers do.

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1 **Q. Are you aware that there's also 12:32:40**
 2 **counterclaim that has been filed on your behalf?**
 3 A. Yes, I authorized the counterclaim to be 12:32:43
 4 filed because I believe that your clients defamed me
 5 and that Mr. Cassell wrote a letter to ABC, which
 6 not even plausibly is within the claim of privilege,
 7 which asserts that I had -- asserts falsely and in a
 8 defamatory way that I had had sexual contact with
 9 Virginia Roberts, yes.
 10 **Q. Did you read the answer to the complaint 12:33:06**
 11 **and counterclaim --**
 12 A. I'm sure I did. 12:33:10
 13 **Q. -- before it was filed? 12:33:11**
 14 A. I'm sure I did. 12:33:11
 15 **Q. And I assume that you approved of it, 12:33:13**
 16 **correct?**
 17 A. I assume I did, yes. 12:33:17
 18 **Q. Okay. 12:33:18**
 19 MR. SCOTT: I object to anything as far as 12:33:20
 20 using pleadings like this, but go ahead and do
 21 it.
 22 BY MR. SCAROLA: 12:33:23
 23 **Q. As a law professor, would it be fair for 12:33:24**
 24 **us to assume that you know the difference between**
 25 **simple negligence and recklessness?**

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1 A. That's something that you could spend an 12:33:32
 2 entire semester teaching the difference between
 3 simple negligence and recklessness. That's very
 4 much a matter of degree and the courts are -- are
 5 split very much on what the meaning of
 6 "recklessness" is, particularly in the context of
 7 defamation. It's a very complicated subject.
 8 **Q. Do you personally recognize that there is 12:33:51**
 9 **a difference between simple negligence and**
 10 **recklessness?**
 11 A. At the extremes, yes, simple negligence is 12:33:58
 12 failure to perform a duty and recklessness is
 13 failure to perform a duty knowing that there --
 14 knowing or should know that there is a likelihood of
 15 some harm being committed. That's just what I
 16 remember from first year torts.
 17 **Q. And you do also recognize that there is a 12:34:17**
 18 **distinction between simple negligence and**
 19 **recklessness on one hand and intentional wrongdoing**
 20 **on the other, correct?**
 21 A. Again, I've argued cases about this issue. 12:34:27
 22 And it's a continuum. Sometimes courts say "that
 23 should have known" is the equivalent of "knowing."
 24 So it's a continuum. There's not an absolute
 25 straight line between those two, yeah.

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1 **Q. Well, what are you charging Professor Paul Cassell and Bradley Edwards with having done? Were they negligent, reckless; or did they knowingly and willfully fabricate false charges against you?** 12:34:48

2

3

4

5 MR. SCOTT: Let me object to the form. 12:35:11

6 It's compound.

7 And, Professor, if you would like to 12:35:13

8 review the complaint and the counterclaim

9 before you respond to that, you have the

10 absolute right to do that.

11 THE WITNESS: I'd like to do that, yes. 12:35:21

12 BY MR. SCAROLA: 12:35:23

13 **Q. Okay. Let me withdraw that question and let me ask this question.** 12:35:23

14

15 MR. SCOTT: My position, just so we 12:35:26

16 understand, is -- and this is a legal

17 objection -- is that while I don't think you

18 can use pleadings to cross-examine a witness,

19 if you're going to do it, he has the right to

20 see it, have it in front of him and respond to

21 it --

22 MR. SCAROLA: That's why I was -- 12:35:37

23 MR. SCOTT: -- as opposed to asking 12:35:38

24 questions in the vagueness.

25 MR. SCAROLA: That's why I'm withdrawing 12:35:40

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1 the question.

2 MR. SCOTT: Thank you. 12:35:43

3 BY MR. SCAROLA: 12:35:43

4 **Q. What do you contend, independent of anything that may be in any pleadings, Bradley Edwards and Paul Cassell are responsible for, negligence, recklessness, or intentional and willful fabrication of lies?** 12:35:43

5

6

7

8

9 A. Let me answer that question in full. It 12:36:02

10 is my belief as I sit here today that Virginia

11 Roberts never accused me of having any sexual

12 contact with her because I never did have any sexual

13 contact with her. And that your clients, Edwards

14 and Cassell, sat with her and said to her, look, if

15 we want to get the NPA knocked out, we have to find

16 a lawyer who worked on the NPA, but who you also had

17 sexual contact with. The only lawyer who fits that

18 description is Alan Dershowitz. Think back, think

19 hard, did you ever have any sexual contact with Alan

20 Dershowitz?

21 And they pressured her into falsely 12:36:48

22 stating something that they knew or should have

23 known was an absolute and deliberate lie. They

24 could have easily found that out. They could have

25 pressed her very hard on why she hadn't previously

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1 named me. They could have pressed her very hard on

2 dates and times and specifics of where these alleged

3 acts could have occurred. And they didn't do that.

4 So I think that it comes much closer to 12:37:18

5 the intentional side of the continuum than the

6 negligence side of the continuum.

7 **Q. Well, you've described it earlier as suborning perjury. That's absolutely intentional, isn't it?** 12:37:35

8

9

10 MR. SCOTT: Objection, argumentative, 12:37:40

11 repetitious. Go ahead, you can answer it.

12 A. I believe that when the time came to file 12:37:44

13 the affidavit in which she described six -- at least

14 six alleged incidents of sexual misconduct with me,

15 including having me standing next to Jeffrey Epstein

16 while he was receiving oral sex, that they knew that

17 that was false. And that I believe that they

18 probably drafted the affidavit. And to my mind,

19 that is subornation of perjury, yes. A criminal

20 act.

21 BY MR. SCAROLA: 12:38:20

22 **Q. They encouraged Virginia Roberts to make up lies about you and provided the details of those lies to her?** 12:38:21

23

24

25 A. No, no -- 12:38:30

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1 MR. SCOTT: Objection, argumentative, 12:38:32

2 repetitious.

3 A. I believe they encouraged Virginia Roberts 12:38:33

4 to make up lies about me and -- and pressed her and

5 asked her to put in details. She would never on her

6 own have come up with some of the details. They're

7 absurd details.

8 I mean, it's very, very bad lawyering on 12:38:49

9 their part, by the way. Very bad lawyering for

10 having her put in details that were so clearly and

11 demonstrably false, such as, for example, meeting

12 Bill Clinton on the island. And they should have

13 known, by the way, when they put in an allegation

14 against me that she had also said that she twice met

15 Al Gore with his wife, once on an air -- once on

16 Jeffrey Epstein's airplane and once on the island.

17 And it is completely clear, and David 12:39:21

18 Boies was the lawyer for -- for Al Gore, as was --

19 as was I, we worked together on that case, that a

20 simple phone call from -- from David Boies to

21 Al Gore would have established that they don't know

22 each other, that he's never been on the island,

23 never been on his airplane.

24 I made a simple phone call on day one and 12:39:46

25 established that. So your clients could have easily

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1 determined that she just lied, lied, lied, lied.
 2 She lied about Al Gore. She lied about Ehud Barak,
 3 she lied about Bill Clinton. She lied about many,
 4 many other people.
 5 This is something that your clients could 12:40:06
 6 easily have found out about, but they closed their
 7 eyes. They willfully blinded themselves to a long
 8 history of lying by your client and willingly put in
 9 an affidavit that they knew would destroy my career,
 10 my 50-year career which I worked so hard to build,
 11 coming from a poor background, with no college
 12 education, being the first member of my family to go
 13 to college, working so hard to build a career,
 14 having an unblemished personal life, and then they
 15 willingly put in these false allegations without
 16 checking. Shame on them.
 17 BY MR. SCAROLA: 12:40:49
 18 **Q. During the period of time between 1998 and 12:40:50**
 19 **2002, you owned a home in the Cambridge area,**
 20 **correct?**
 21 A. Yes. 12:41:04
 22 **Q. Single-family home in a residential area? 12:41:04**
 23 A. Yes. 12:41:07
 24 **Q. Would you please describe the exterior of 12:41:07**
 25 **that home to us?**

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1 A. Yes. It was wooden home, built by an 12:41:12
 2 architect named Coolidge. Had a little basketball
 3 hoop where I played basketball with my children on
 4 one side. It had a swimming pool -- an indoor
 5 swimming pool on the other side. The exterior was
 6 gray/blue wood.
 7 **Q. If someone were to enter through the front 12:41:41**
 8 **door of your home, would they see some sort of stone**
 9 **configuration outside the house?**
 10 A. After a period of time, we had a 12:41:56
 11 sculpture -- a sculptor from Martha's Vineyard make
 12 a stone sculpture and a light that stood outside of
 13 our house. You can probably see that on Google.
 14 **Q. When -- when was that stone sculpture 12:42:10**
 15 **installed?**
 16 A. I would have to check. I don't know. But 12:42:16
 17 anybody can see that on Google Maps.
 18 MR. SCOTT: Let me object to the relevancy 12:42:20
 19 of all this.
 20 BY MR. SCAROLA: 12:42:23
 21 **Q. Describe the floor plan at the entry level 12:42:24**
 22 **of the house, please.**
 23 MR. SCOTT: Can you make a proffer as to 12:42:26
 24 what the relevancy to this is?
 25 MR. SCAROLA: Not until after I get the 12:42:29

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1 questions answered.
 2 A. You walk into the house, and there's a 12:42:33
 3 foyer that extends probably about 6-foot wide and
 4 maybe 20 feet long. Yeah. Yeah.
 5 BY MR. SCAROLA: 12:42:58
 6 **Q. Is there a kitchen at the entry level? 12:42:59**
 7 A. There is only an entry level and so -- 12:43:03
 8 **Q. One-story home? 12:43:05**
 9 A. It's a one-story home. 12:43:06
 10 **Q. And so the kitchen is on that first floor? 12:43:07**
 11 A. Kitchen is on the first floor to the left, 12:43:11
 12 yes.
 13 **Q. And is there a living room or a lounge 12:43:13**
 14 **room adjacent to the kitchen?**
 15 A. Adjacent to the kitchen there is a large 12:43:22
 16 room which serves part of it as a dining area and
 17 part of it as a living room, yes.
 18 **Q. And during this period of time that we're 12:43:29**
 19 **focusing on between 1998 and --**
 20 A. 1998? 12:43:38
 21 **Q. Yes, sir. 12:43:39**
 22 A. Okay, okay. 12:43:40
 23 **Q. Between 1998 and 2002, how was the -- how 12:43:42**
 24 **was that room furnished?**
 25 A. Well, it would be easy to tell because 12:43:47

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1 it's been the subject of many photographic essays
 2 that appeared in magazines and newspapers. Our home
 3 was often photographed. So anybody would know what
 4 the interior of it looked like. Just a simple
 5 Google search would show you what the interior of
 6 the house looked like.
 7 **Q. Tell us what it looked like, please. 12:44:07**
 8 A. Well, what specifically? 12:44:08
 9 **Q. Well -- 12:44:11**
 10 A. It had a couch when you walk in. 12:44:12
 11 **Q. Okay. What other furniture? 12:44:14**
 12 A. It had chairs. It had a dining room 12:44:15
 13 table, all of which have been pictured in various
 14 magazines and newspapers.
 15 **Q. Was there a desk in that room? 12:44:27**
 16 A. No. 12:44:31
 17 **Q. Bookshelves? 12:44:33**
 18 A. In the living room? 12:44:34
 19 **Q. In the rooms adjacent to the kitchen. 12:44:37**
 20 A. No, not to my recollection. 12:44:41
 21 Why, does Virginia Roberts claim to have 12:44:47
 22 been in my home?
 23 **Q. What kind of floor coverings are there on 12:44:50**
 24 **the entry level?**
 25 A. Floor coverings? 12:44:57

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1 **Q. Yes.** 12:44:59

2 A. In the entry level right as you walk in, 12:45:02

3 there are no floor coverings. There are --

4 **Q. Tile, wood?** 12:45:09

5 A. Not a rug. Just a floor. 12:45:13

6 **Q. What kind of floor?** 12:45:16

7 A. I don't remember. 12:45:18

8 **Q. What was its composition?** 12:45:18

9 A. I don't remember. 12:45:20

10 **Q. How about the living room, what was the 12:45:20**

11 **composition of the floor in the living room?**

12 A. Cork, I think. Cork, yeah. 12:45:26

13 **Q. How many times has Jeffrey Epstein been a 12:45:34**

14 **guest in that Cambridge, Massachusetts house?**

15 A. Maybe -- 12:45:44

16 MR. SWEDER: When you say "guest," you 12:45:46

17 don't mean sleeping over?

18 A. He's never slept over. 12:45:51

19 BY MR. SCAROLA: 12:45:52

20 **Q. I didn't say anything about sleeping over. 12:45:52**

21 MR. SWEDER: I just want to make sure the 12:45:54

22 record is clear.

23 A. He has never slept over. Maybe three 12:45:55

24 times. Maybe. Maybe three times. That would be a

25 rough estimate. Not very many.

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1 MR. SCOTT: During the relevant timeframe. 12:46:12

2 A. During the relevant timeframe. 12:46:15

3 MR. SCOTT: 1999 to 2002. 12:46:16

4 A. 1999 to 2002. Oh, either -- maybe once. 12:46:17

5 Maybe once. Certainly not many times.

6 BY MR. SCAROLA: 12:46:24

7 **Q. At least once?** 12:46:27

8 A. I don't -- 12:46:29

9 **Q. Maybe two, maybe three?** 12:46:29

10 A. No, no, I have no recollection -- 12:46:31

11 MR. SCOTT: Okay. 12:46:32

12 A. I have no recollection of him being there 12:46:33

13 at all during that relevant time period. But

14 remembering that he had been in my house on a couple

15 of occasions, it's certainly possible during that

16 relevant time period he had been there once or

17 twice.

18 BY MR. SCAROLA: 12:46:46

19 **Q. How many times -- excuse me. When he did 12:46:47**

20 **visit, with whom -- who accompanied him?**

21 MR. SCOTT: Let me ask you a question. 12:46:55

22 Are we -- is this relevant timeframe or any

23 time? I'm just trying --

24 MR. SCAROLA: Since we can't narrow it 12:46:59

25 down to the relevant timeframe, I want to know

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1 any time.

2 BY MR. SCAROLA: 12:47:02

3 **Q. Any time that Jeffrey Epstein visited your 12:47:03**

4 **home, who was with him?**

5 A. Normally Ghislaine Maxwell and Sarah 12:47:07

6 Kellen. And he may have had another assistant or

7 secretary or somebody. He usually traveled.

8 Usually he would fly in to Bedford 12:47:20

9 Airport, have a car take him -- usually go to his

10 office. He had an office in Harvard Square, and if

11 he came by my house, he came by my house with

12 whoever was his entourage at any given point in

13 time.

14 BY MR. SCAROLA: 12:47:41

15 **Q. And that usually was?** 12:47:42

16 A. Sarah Kellen, Maxwell and sometimes 12:47:43

17 another one or two people.

18 **Q. How old was Sarah Kellen when she was part 12:47:49**

19 **of Jeffrey Epstein's entourage?**

20 A. If I had to estimate, I would say younger 12:47:56

21 than 30 and older than 25. Somewhere between 25 and

22 30, probably closer to 30.

23 **Q. You would describe her as a young woman? 12:48:06**

24 A. I would describe her as a woman between 12:48:08

25 the ages of 25 and 30.

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1 **Q. Does that in your mind fit the description 12:48:15**

2 **of a young woman?**

3 A. I don't want to categorize a woman by her 12:48:19

4 age. It's a woman between 25 and 30. It's not a

5 teenager. It's not a middle-aged woman. It's a

6 woman between the ages of 25 and 30.

7 **Q. What was Sarah Kellen's role in Jeffrey 12:48:32**

8 **Epstein's entourage?**

9 A. She would, to my knowledge, arrange 12:48:37

10 transportation, she would arrange meetings when

11 meetings were occurring. She worked, I think, at

12 the Harvard office where he would have meetings with

13 George Church, the man who developed the genome,

14 Larry Summers, the president of Harvard, Henry

15 Rosovsky, the provost, the former provost of

16 Harvard; Stephen Kosslyn, the chairman of the

17 psychology department at Harvard, a man who wrote

18 multiple intelligences, whose name is slipping my

19 mind now, but from the Ed School.

20 She would arrange some of those lunch 12:49:23

21 meetings where we would discuss serious issues, some

22 of us were asked to present. I presented on one or

23 two occasions and we were asked to critique and she

24 would take notes and arrange transportation and do

25 things of that kind.

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1 **Q. How old was Ghislaine Maxwell?** 12:49:40

2 A. Ghislaine, Ghislaine Maxwell. I would 12:49:45

3 estimate --

4 MR. SCOTT: Your French isn't real high. 12:49:48

5 A. I would estimate that she was at the time 12:49:50

6 between 35 and 40.

7 BY MR. SCAROLA: 12:49:55

8 **Q. And what was her role in Jeffrey Epstein's 12:49:55**

9 **entourage?**

10 A. She was basically his major domo. She 12:49:58

11 arranged travel as well. And she would tell you

12 when you could meet with him, when to come over.

13 She would call me at my office and say, Jeffrey

14 would like to meet with you at 4:10, and then she

15 would call back and say, could you make it at 4:30?

16 I would say that Ghislaine was the senior 12:50:19

17 person organizing his kind of academic contacts and

18 Sarah Kellen was the junior person. They worked in

19 overlapping roles.

20 **Q. Were there any other entourage members 12:50:34**

21 **that traveled with Jeffrey Epstein when he came to**

22 **your home?**

23 A. I have no recollection of any of them ever 12:50:41

24 coming to my home. I don't remember. But if that's

25 who he traveled with. Sometimes he would travel --

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1 he almost always had a regular girlfriend. And I

2 remember a few of them. One of them was a student

3 at the business school who's -- I may be merging two

4 of them.

5 One of them was a student at the business 12:51:03

6 school. Another, maybe the same one, was a wealthy

7 woman whose father owned banks in Great Britain.

8 Another was a woman from either the Czech Republic

9 or Slovakia who was probably between 20 and 25,

10 probably closer to 25. And he would travel with a

11 posse, basically, an entourage of -- of people. But

12 I never met some of the people who are in the

13 entourage. They were just there.

14 **Q. They were there at the same time that you 12:51:38**

15 **were there and Jeffrey Epstein was there?**

16 A. Well, they were -- 12:51:42

17 MR. SCOTT: Wait a minute. That's vague. 12:51:43

18 I mean, there in the house, there in

19 Massachusetts?

20 MR. SCAROLA: There wherever. 12:51:47

21 BY MR. SCAROLA: 12:51:47

22 **Q. When you were in Jeffrey Epstein's 12:51:48**

23 **presence, Jeffrey Epstein usually had what you have**

24 **described as some regular girlfriend.**

25 A. That's right. 12:51:58

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1 **Q. And you have described a variety of 12:51:59**

2 **different regular girlfriends who were with him,**

3 **correct?**

4 A. Yes. 12:52:06

5 **Q. Usually in the age range, you would 12:52:06**

6 **estimate, between 20 and 25; is that correct?**

7 A. I would say -- 12:52:13

8 MR. SCOTT: Objection. That's not it. 12:52:14

9 A. I would say between 22 and 25 would be a 12:52:15

10 closer -- closer estimate. But 23, in that range.

11 There were none that I ever believed were 12:52:25

12 in any way teenagers. And they all performed tasks.

13 They were taking notes or they were arranging,

14 serving coffee or doing various things. And that's

15 the way Jeffrey would travel when he went to

16 academic meetings.

17 And these people were seen not only by me. 12:52:45

18 They were seen by Larry Summers, they were seen by

19 Church, they were seen by Marvin Minsky, they were

20 seen by some of the most eminent academics and

21 scholars in the world. There was no hint or

22 suggestion of anything sexual or improper in the

23 presence of these people.

24 BY MR. SCAROLA: 12:53:09

25 **Q. Describe the motor vehicle that Jeffrey 12:53:09**

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1 **Epstein used to travel from the airport to your home**

2 **on those occasions when you observed --**

3 A. I have no recollection. They were rented 12:53:20

4 cars.

5 **Q. Limousines? 12:53:24**

6 A. Limousines, yeah, yeah. 12:53:24

7 **Q. And did you ever travel from your home 12:53:26**

8 **with Jeffrey Epstein in a limousine?**

9 MR. SCOTT: Objection, form, overly broad. 12:53:35

10 A. Not during the relevant time period, no, 12:53:37

11 no.

12 BY MR. SCAROLA: 12:53:41

13 **Q. So, you can state with certainty, based 12:53:43**

14 **upon your superb memory, that at no time between**

15 **1999 and 2002 did you ever travel from your home in**

16 **a limousine with Jeffrey Epstein?**

17 A. I can't imagine any reason why I would 12:54:03

18 have. I did not fly in his plane during that period

19 of time, my records establish. And I would see no

20 reason why I would have. I don't have any

21 recollection whether I specifically drove with him

22 during that period of time. But I think I did not.

23 Because I did not have any reason.

24 Normally if I drove with him, it would be 12:54:25

25 to go to the airport to get on his plane. That was

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1 the only reason that I would have ever to go in a
 2 limousine that I know of.

3 **Q. What records establish that you were not 12:54:37**
 4 **on Jeffrey Epstein's plane during what you have**
 5 **described as the relevant time period?**

6 A. No, you've described it as the relevant 12:54:46
 7 time period. You said 2009 to 2000--

8 **Q. No, sir. In the answer you just -- 12:54:51**

9 A. -- 1999 -- 12:54:52

10 **Q. -- gave, you used the phrase "relevant 12:54:53**
 11 **time frame," time period.**

12 A. Yeah, I was picking up on your terms 12:54:54
 13 between 1999 and 2002. So can we agree that's the
 14 relevant time period?

15 **Q. You can tell me what -- what your response 12:55:03**
 16 **is based on that you never traveled on Jeffrey**
 17 **Epstein's airplane during the relevant time period,**
 18 **whatever you consider that to be.**

19 A. Okay. Number 1, my own calendars, which 12:55:15
 20 have been provided to you. Number 2, my cell phone
 21 records. Number 3, my wife's calendars. Number 4,
 22 my teaching and other schedule.

23 Number 5, my own recollection. And number 12:55:33
 24 6, as far as we know, the airplane manifests do not
 25 have me on any airplanes during that time period.

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1 **Q. What do you mean as far as -- 12:55:49**

2 MR. SCOTT: We can take a break at some 12:55:50
 3 point. It's about 1:00.

4 BY MR. SCAROLA: 12:55:53

5 **Q. What do you mean as far as you know, the 12:55:54**
 6 **airplane manifests --**

7 A. I've only seen some manifests and none of 12:55:57
 8 them have me on any airplane during the relevant
 9 time period. I have no idea whether there are any
 10 other manifests. I wouldn't know.

11 **Q. Well, have you seen manifests from the 12:56:07**
 12 **period between 1999 and 2002?**

13 A. I think I have, yes. I think I have, 12:56:12
 14 yeah.

15 **Q. Okay. The entire period, covers the whole 12:56:14**
 16 **period?**

17 A. Yeah. I think I've been told by my 12:56:17
 18 lawyers --

19 MR. SIMPSON: Don't -- 12:56:20

20 A. Okay. I have been advised by people who 12:56:21
 21 have seen the records that there is -- that I was
 22 not on any of Jeffrey Epstein's planes during that
 23 period of time. And that comports with my -- with
 24 my memory.
 25

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1 BY MR. SCAROLA: 12:56:34

2 **Q. Which people told you they saw airplane 12:56:34**
 3 **manifests for the period between 1999 and 2002?**

4 MR. SCOTT: If that involves lawyer 12:56:44
 5 conversations and --

6 A. It does involve lawyer conversations, yes. 12:56:46

7 MR. SCAROLA: He just waived it. 12:56:48

8 MR. SCOTT: I'm not taking that position. 12:56:50

9 BY MR. SCAROLA: 12:56:52

10 **Q. Okay. So your position is that you are 12:56:53**
 11 **not disclosing --**

12 A. I'm happy to disclose -- 12:56:54

13 **Q. -- who told you -- 12:56:56**

14 A. I'm happy to disclose -- 12:56:57

15 MR. SCOTT: No, no, I'm the lawyer here. 12:57:00
 16 I'm telling him not to answer that question.
 17 I'll discuss it at the lunch break and I'll get
 18 back to you. And I would also like to know
 19 what the relevancy of all those questions were
 20 about the house.

21 THE WITNESS: I can figure it out. 12:57:10

22 BY MR. SCAROLA: 12:57:15

23 **Q. Who -- did you personally see airplane 12:57:15**
 24 **manifests during that period between 1999 and 2002?**

25 A. My recollection is that I have looked at 12:57:23

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1 plane manifests. I think they were prepared to be
 2 shown to various people who I'm not allowed -- I'm
 3 told not to talk about.

4 MR. SCAROLA: Okay. You've requested a 12:57:41
 5 break.

6 MR. SCOTT: Take a lunch. 12:57:44

7 VIDEOGRAPHER: Going off the record. The 12:57:44
 8 time is approximately 12:57 p.m.

9 (Recess was from 12:57 p.m. until 3:43 p.m.) 13:10:50

10 VIDEOGRAPHER: Going back on the record. 13:35:41
 11 The time is approximately 3:43 p.m.

12 BY MR. SCAROLA: 15:43:41

13 **Q. Mr. Dershowitz, did you author a book 15:43:43**
 14 **called My Life in Court?**

15 A. No. 15:43:47

16 **Q. Do you recall having said the following: 15:43:49**
 17 **"There's an old saying if you have the law on your**
 18 **side, bang on the law. If you have the facts on**
 19 **your side, bang on the facts. If you have neither,**
 20 **bang on the table. I have never believed that, but**
 21 **I do believe in a variation of that theme. If you**
 22 **don't have the law or legal facts on your side,**
 23 **argue your case in the Court of public opinion"?**

24 **Did you say that those things? 15:44:17**

25 MR. SCOTT: Let me object to the form of 15:44:19

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1 that because the statement does not give a
 2 time, date, place or anything of his
 3 recollections.
 4 A. No, I remember saying that in following 15:44:25
 5 context, I was accused of an unspeakable heinous
 6 crime by lawyers who deliberately put it in a court
 7 pleading that they believe would give them immunity.
 8 They put it in a pleading which I was not a party.
 9 I had no realistic legal opportunity to respond to
 10 the lies and in that context, my only alternative
 11 was to respond to the media when the media called
 12 me, because obviously the media had been alerted to
 13 these lies that were inserted in a judicial
 14 proceeding, and I had no alternative but to respond
 15 in the court of public opinion.
 16 I prefer to respond in courts of law. In 15:45:16
 17 fact, I've had cases in my career, including a
 18 double capital case, where I made a deal with the
 19 prosecutor initially that I would never speak to the
 20 press if he would never speak to the press and we
 21 honored that deal even when I won the case and my
 22 clients were taken off death row.
 23 So my strong preference would be to 15:45:34
 24 respond in the court of law where I think I have
 25 abilities and talents to respond. But when I have

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1 no alternative because of the way in which the
 2 lawyers put the false allegations in a judicial
 3 pleading hoping to get judicial immunity, yes, at
 4 that point the appropriate response is in the court
 5 of public opinion.
 6 That's what Justice Blackmun said in a 15:46:00
 7 concurring opinion in the Supreme Court, that the
 8 duty of a lawyer does not stop at the courtroom door
 9 but it continues on to the courtroom steps. And my
 10 attitude is you fight the battle wherever the other
 11 side starts it.
 12 So, if the battles are started in the 15:46:16
 13 court of public opinion, I have an obligation to
 14 continue it in the court of public opinion.
 15 MR. SCAROLA: Move to strike the 15:46:25
 16 unresponsive answer. Let me try again and I'll
 17 make it a little simpler for you.
 18 BY MR. SCAROLA:
 19 **Q. Did you say if you don't have the law or 15:46:31**
 20 **legal facts on your side, argue your case in the**
 21 **court of public opinion?**
 22 A. I said that in the context of an 15:46:39
 23 ability -- an inability to respond in the court of
 24 law. In this case, I think I have -- I know I have
 25 the facts on my side. In this case, it was unclear

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1 whether I had the law on my side at that time when
 2 I, of course, learned that Professor Cassell made a
 3 statement to ABC News that was not privileged and
 4 when I also learned about statements made by both
 5 Cassell and Edwards, I realized at that point I had
 6 the law on my side, the facts on my side, and
 7 morality. And that's the most important thing to
 8 me, morality on my side.
 9 BY MR. SCAROLA: 15:47:22
 10 **Q. You are quoted in an April 2007 edition of 15:47:24**
 11 **the Daily Mail as having said "The financier,"**
 12 **referring to Jeffrey Epstein, "had paid for massages**
 13 **but had not engaged in sex or erotic massages with**
 14 **any minors."**
 15 **Did you make that statement? 15:47:53**
 16 A. Can you show me? 15:47:54
 17 MR. SCOTT: Would you like to see the 15:47:56
 18 article?
 19 THE WITNESS: Yes, of course I would. 15:47:58
 20 MR. SCOTT: Can he see it, please? 15:48:04
 21 BY MR. SCAROLA: 15:48:05
 22 **Q. Does that help to refresh your superb 15:48:06**
 23 **memory?**
 24 MR. SCOTT: Objection. No -- he asked to 15:48:09
 25 see it. There's no question pending. He's

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1 reviewing the document.
 2 A. I have no recollection of having made that 15:48:16
 3 statement, nor do I know whether it's an accurate
 4 rendition. I note that it's not in quotation marks.
 5 BY MR. SCAROLA: 15:48:24
 6 **Q. So you can't remember one way or another 15:48:25**
 7 **whether you said that; is that correct?**
 8 A. I can't remember my exact words. I was -- 15:48:28
 9 I was defending Jeffrey Epstein both in the court of
 10 law and in the court of public opinion.
 11 **Q. So, as far as Jeffrey Epstein was 15:48:37**
 12 **concerned, you decided to resort to the court of**
 13 **public opinion --**
 14 A. Because -- 15:48:45
 15 **Q. -- correct? 15:48:45**
 16 A. Because the press had called me because 15:48:46
 17 Epstein's opponents had gone to the press and tried
 18 to make the case against him in the press. As I
 19 said previously, and I've stated this over and over
 20 again, I will fight for my client in any forum in
 21 which the fight is commenced by the other side. If
 22 the fight is limited to the court, I much prefer to
 23 fight in the court.
 24 No defendant benefits from having his case 15:49:09
 25 in the newspapers. Every defendant I know and every

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1 defense lawyer I know, and I certainly teach this to
 2 my students, try to keep the case out of the press,
 3 try to keep the press as far away from the case as
 4 possible. But if the press is covering the opposing
 5 point of view, you have an obligation to respond in
 6 whatever forum the -- the prosecution of your
 7 clients or the persecution of your clients is taking
 8 place. That's been a principle that I've applied
 9 throughout my professional career.

10 **Q. And you have an obligation to respond 15:49:42**
 11 **truthfully when you make public statements?**

12 A. Absolutely, right. 15:49:47

13 **Q. The Code of Professional Responsibility of 15:49:48**
 14 **the Bar of the State of Massachusetts requires you**
 15 **to be truthful in making statements to third**
 16 **parties, correct?**

17 A. I'm fully aware of the Code of 15:49:58
 18 Professional Responsibility. I've always complied
 19 with it. I've never violated it, and I wish I could
 20 say the same for your clients, but I can't.

21 **Q. As you sit here today, knowing that more 15:50:07**
 22 **than 30 underage women have come forward to report**
 23 **that your friend, Jeffrey Epstein, paid them for sex**
 24 **and that he pled guilty to procuring underage girls**
 25 **for prostitution, and that he paid very large sums**

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1 **of money to settle their civil claims against him,**
 2 **do you still insist that he had not engaged in sex**
 3 **or erotic massages with any minors?**

4 A. As I told you -- 15:50:45

5 MR. WEINBERG: I would like to register an 15:50:46
 6 objection --

7 MR. SCOTT: Wait a minute. 15:50:46

8 MR. WEINBERG: -- to the extent that your 15:50:46
 9 opinion --

10 THE COURT REPORTER: I'm sorry, I can't 15:50:46
 11 hear the gentleman.

12 MR. SCAROLA: We're going to -- we're 15:50:52
 13 going to object to more than one lawyer --

14 MR. SCOTT: He's representing Epstein, 15:50:57
 15 just like she represents Boies.

16 MR. SCAROLA: That's fine. 15:51:01

17 MR. SCOTT: This is -- this is Epstein's 15:51:02
 18 lawyer. And they have attorney-client relation
 19 there, so --

20 MR. SCAROLA: Yeah, is there some 15:51:12
 21 volume --

22 THE WITNESS: Go ahead, Marty. 15:51:13

23 MR. WEINBERG: The -- the objection is to 15:51:16
 24 the extent the question requires you to rely on
 25 information you learned as a result of your

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1 attorney-client communications, representation
 2 of Epstein, work product, I object.

3 BY MR. SCAROLA: 15:51:31

4 **Q. Do you understand the question? 15:51:32**

5 A. I understand the question and I understand 15:51:33
 6 the objection.

7 **Q. Yes, sir. And are you going to answer the 15:51:36**
 8 **question?**

9 THE WITNESS: Marty, you're the lawyer for 15:51:38
 10 my client. Do you -- do you order me to answer
 11 the question or not?

12 MR. WEINBERG: The client does not waive 15:51:46
 13 any of the privileges; and, again, to the
 14 extent you're required to rely on what you
 15 learned as a result of your professional legal
 16 relationship with Epstein, your representation
 17 of him in any of -- any of his legal cases, I
 18 object and would instruct you to the extent you
 19 will accept an instruction from your client's
 20 lawyer not to answer.

21 BY MR. SCAROLA: 15:52:11

22 **Q. Mr. Dershowitz, you know -- I assume 15:52:12**
 23 **you're going to follow the instruction, correct?**

24 MR. SCOTT: Yes, you're going to follow 15:52:15
 25 the instruction.

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1 A. I am going to follow the instruction. I 15:52:16
 2 have no choice. He's my client.

3 BY MR. SCAROLA: 15:52:19

4 **Q. I assume you know from sources entirely 15:52:20**
 5 **independent of anything that Jeffrey Epstein told**
 6 **you, from sources entirely independent of attorney**
 7 **work product privileged information, that Jeffrey**
 8 **Epstein is guilty of being a serial child molester,**
 9 **right?**

10 A. Absolutely not. Absolutely not. 15:52:37

11 **Q. You don't know independent of those 15:52:39**
 12 **sources?**

13 A. Not only -- no, I don't know that 15:52:41
 14 independent --

15 **Q. Okay. Thank you. 15:52:43**

16 A. -- of those sources. Of course not. 15:52:43

17 **Q. You know that he pled guilty to sexual 15:52:45**
 18 **abuse of minors, correct?**

19 A. Could you tell me exactly what he pleaded 15:52:54
 20 guilty to so I can answer that question?

21 **Q. Well, do you know? You represented him 15:52:58**
 22 **during the period of time that he was under -- that**
 23 **he was -- that he was under criminal charges, didn't**
 24 **you?**

25 MR. SCOTT: So you're withdrawing the 15:53:06

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1 prior question; you're now asking this
 2 question? Okay.
 3 MR. SCAROLA: That's correct, I'm 15:53:09
 4 asking --
 5 A. So I represented him -- 15:53:10
 6 MR. SCAROLA: -- this question. 15:53:10
 7 A. I represented him first in Palm Beach 15:53:11
 8 County, and at that point, he had been prepared to
 9 plead guilty to, I think, one count --
 10 MR. WEINBERG: Alan, I'm sorry. This is 15:53:24
 11 again, going right into the work that you did
 12 for him as his lawyer and I instruct you not to
 13 answer.
 14 MR. SCOTT: That's it then, follow his -- 15:53:32
 15 as your attorney, I'm telling you to follow the
 16 lawyer's advice.
 17 THE WITNESS: Uh-huh. 15:53:36
 18 BY MR. SCAROLA: 15:53:37
 19 **Q. You are aware that on October 20, 2005, 15:53:37**
 20 **the Palm Beach police department executed a search**
 21 **warrant on Jeffrey Epstein's Palm Beach mansion,**
 22 **correct?**
 23 A. I'm not aware of that, no. 15:53:45
 24 **Q. You didn't know that? 15:53:46**
 25 A. I don't know that as I stand here today 15:53:48

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1 what date or when --
 2 **Q. Do you know that a search warrant was 15:53:52**
 3 **executed?**
 4 A. I recall -- 15:53:54
 5 MR. WEINBERG: Again, the objection is if 15:53:55
 6 you only know it as a result of your legal
 7 representation of Mr. Epstein, I object to your
 8 answering on that basis. If you know it from
 9 independent sources, then I have no objection.
 10 A. I do not know it from independent sources. 15:54:08
 11 BY MR. SCAROLA: 15:54:10
 12 **Q. You know it from having read a very 15:54:11**
 13 **lengthy Palm Beach police department investigative**
 14 **report, don't you?**
 15 MR. SCOTT: Objection. 15:54:19
 16 MR. WEINBERG: And I object. If you read 15:54:20
 17 it in the context of providing legal
 18 representation to Jeffrey Epstein, it's
 19 attorney-client, it's work product, and it's
 20 the same objection.
 21 THE WITNESS: Let me put on the record, 15:54:31
 22 too, that I'm happy to answer any of these
 23 questions if I were permitted to do so because
 24 they're all exculpatory of me, but I must obey
 25 my lawyer -- the lawyer's instructions.

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1 MR. SCAROLA: And it is my suggestion that 15:54:43
 2 the statement that the answers would be
 3 exculpatory is a waiver of any privilege that
 4 might attach, particularly with regard to work
 5 product, which is not Jeffrey Epstein's
 6 privilege, but if it exists at all, is Alan
 7 Dershowitz's privilege.
 8 MR. SCOTT: We obviously don't agree with 15:55:01
 9 that.
 10 BY MR. SCAROLA: 15:55:03
 11 **Q. Do you agree, Mr. Dershowitz, that 15:55:04**
 12 **deciding the issues in this case will depend on**
 13 **evaluating not only Virginia Roberts' credibility**
 14 **but your credibility as well?**
 15 MR. SCOTT: Objection, legal conclusion, 15:55:14
 16 not relevant here.
 17 A. I think that I can prove my complete 15:55:17
 18 innocence and the fact that -- that Virginia Roberts
 19 made up the story out of whole cloth without my
 20 credibility being at issue, but I'm perfectly happy
 21 to put my credibility at issue because I am telling
 22 the blue absolute truth about everything regarding
 23 Virginia Roberts.
 24 BY MR. SCAROLA: 15:55:39
 25 **Q. One way to evaluate credibility is to 15:55:40**

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1 **compare an individual's statements with available**
 2 **documentary evidence, correct?**
 3 A. That's too broad a question. Depending on 15:55:48
 4 what the documentary evidence could be. Documentary
 5 could be lies. Documents contain lies and oral
 6 statements contain truth. So, no, I don't think
 7 that's a particularly good way. It depends on the
 8 nature of the document.
 9 For example, videotape would be very good. 15:56:04
 10 If you had a videotape that in some way supported
 11 Virginia Roberts' statements and it undercut what I
 12 said, that would be fine. That's why from day one
 13 I've asked to have if there are any videotape shown
 14 or any photographs because I know what happened. I
 15 know that I never had any contact, any sexual
 16 contact, any improper contact with Virginia Roberts.
 17 And I know, therefore, that there cannot 15:56:27
 18 be any evidence that contradicts that because you
 19 can't simply make up facts. So I am telling you the
 20 absolute truth.
 21 **Q. You also know that all of the videotapes 15:56:37**
 22 **that were taken through surveillance cameras**
 23 **throughout Jeffrey Epstein's home were destroyed,**
 24 **don't you?**
 25 A. Of course I don't know that. 15:56:47

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1 **Q. You don't know?** 15:56:48

2 A. Of course not. 15:56:49

3 **Q. So you didn't read the police reports 15:56:50**

4 **then?**

5 MR. SCOTT: Objection. Mr. Epstein, do 15:56:52

6 you want him to answer that question?

7 MR. SIMPSON: Mr. Weinberg. 15:56:59

8 MR. SCOTT: Mr. Weinberg? 15:57:00

9 MR. WEINBERG: It's the same objection. 15:57:00

10 If you learned it as a result of the -- or in

11 the context of legal representation and while

12 providing legal counsel to Jeffrey Epstein, I

13 object.

14 MR. SCOTT: Based on this lawyer's 15:57:12

15 position, your client's lawyer's position, if

16 any of your answers involve that what he's

17 saying, I don't want you to answer them, okay?

18 THE WITNESS: The only thing I can say 15:57:21

19 that doesn't --

20 MR. SIMPSON: Alan -- 15:57:23

21 MR. SCOTT: There's no question. 15:57:23

22 A. That doesn't involve. 15:57:24

23 MR. SCOTT: There's no question. 15:57:25

24 THE WITNESS: Oh, there's no question. 15:57:26

25 Sorry.

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1 BY MR. SCAROLA: 15:57:28

2 **Q. You have stated publicly repeatedly that 15:57:29**

3 **the airplane manifests will exonerate you, correct?**

4 A. I have stated publicly that the airplane 15:57:35

5 manifest, the one that I have seen, do not show me

6 on any of Jeffrey Epstein's airplanes in the

7 relevant period of time, which I define as the

8 summer of 1999 through the summer of 2002, number 1.

9 Number 2, that none of the airplane 15:57:52

10 manifests will show me on the same plane with

11 Virginia Roberts.

12 And 3, that none of the manifests will 15:58:01

13 show me on an airplane with Jeffrey Epstein and any

14 underage girls that were at least visible in the

15 passenger part of the airplane.

16 **Q. Well, that raises an interesting point, 15:58:13**

17 **Mr. Dershowitz. Tell us about the interior --**

18 A. Why is it interesting? 15:58:16

19 **Q. -- of that plane. 15:58:18**

20 THE COURT REPORTER: I'm sorry, I didn't 15:58:18

21 hear your question.

22 BY MR. SCAROLA: 15:58:18

23 **Q. That raises an interesting point. Tell us 15:58:20**

24 **about that the interior of that plane.**

25 A. My recollection is the plane was a 15:58:24

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1 Gulfstream IV. That it had a cabin that seated

2 approximately one, two, three, four -- maybe ten --

3 ten people. It had mostly seats -- I used to sit in

4 the seat facing backward, that's the way I prefer to

5 fly.

6 And in the back of the plane there was a 15:58:52

7 toilet, a place to serve food. And a couch that

8 served as a seat with seat belts for maybe two or

9 three additional people. But I never saw the

10 plane -- the only time I ever saw the plane filled

11 to capacity was when I went down to watch a launch

12 of a satellite --

13 **Q. Does that have -- 15:59:19**

14 A. -- to outer space. 15:59:20

15 **Q. -- anything to do with the configuration 15:59:20**

16 **of the interior of the plane?**

17 A. Yes. Yes, I'm telling you that I've 15:59:25

18 mostly seen it only with four or five people. The

19 only time I've seen the couch --

20 **Q. Did I ask you how many people -- 15:59:29**

21 MR. SCOTT: Well, you're interrupting -- 15:59:30

22 BY MR. SCAROLA: 15:59:31

23 **Q. -- were in the plane at the time I asked 15:59:32**

24 **you what the configuration of the cabin was,**

25 **Mr. Dershowitz?**

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1 A. I'm explaining -- 15:59:35

2 **Q. Is that part of the question that I 15:59:35**

3 **asked --**

4 A. I'm explaining the couch. 15:59:37

5 **Q. -- or is that your effort to make speeches 15:59:38**

6 **in an effort to consume the limited amount of time**

7 **that we have?**

8 MR. SCOTT: I would object to that 15:59:44

9 characterization.

10 A. I wanted to start at -- I wanted to start 15:59:44

11 at 12:00 -- at 1:30 today.

12 MR. SCOTT: And the speech. 15:59:48

13 MR. SIMPSON: Alan, Alan. 15:59:48

14 A. All the delays have been caused by you, 15:59:49

15 not me. And I'm ready to go to 5:30, but you're

16 quitting at 5 -- or 4:30.

17 BY MR. SCAROLA: 15:59:55

18 **Q. Yes, sir, I have -- 15:59:55**

19 A. So don't blame any delays on me, sir. 15:59:56

20 **Q. -- a commitment -- I have a commitment to 15:59:58**

21 **chair an --**

22 A. Don't we all. 15:59:59

23 **Q. -- Easter Seals fundraiser. 15:59:59**

24 A. We all have commitments. 16:00:00

25 **Q. You've known -- 16:00:02**

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1 MR. SCOTT: Timeout. Timeout. Let's 16:00:02
 2 everybody --

3 BY MR. SCAROLA: 16:00:03

4 **Q. -- that for three days. 16:00:03**

5 MR. SCOTT: Everybody cool down. 16:00:05
 6 Everybody cool down. It's late in the day.
 7 That includes Mr. Scarola, my client. Let's do
 8 question and answer.

9 BY MR. SCAROLA: 16:00:14

10 **Q. New question -- 16:00:15**

11 MR. SCOTT: Here we go, new question. 16:00:15

12 BY MR. SCAROLA: 16:00:15

13 **Q. -- did you see a bed in the plane? 16:00:15**

14 A. I never saw a bed in the plane. As far as 16:00:16
 15 I know, there was no bed in the plane. And that's
 16 what I was trying to explain. That the only time
 17 I've seen that couch used is when two or three
 18 people were sitting in it when we went down to watch
 19 the launch of the satellite because that was the
 20 only time I saw the plane filled.

21 Other than that, it was a plain, ordinary 16:00:36
 22 couch that was never used by anybody during the
 23 flights. We were all sitting in our seats. I do
 24 not know for a fact that that couch becomes a bed.
 25 I never saw it as a bed. And the answer is

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1 categorically no.

2 **Q. Well, the question was: Is there a bed on 16:00:57**
 3 **the plane? The answer to that question is not a**
 4 **categorical no; the answer to that question is you**
 5 **don't know; is that right?**

6 A. The answer to that question is there is a 16:01:05
 7 couch on the plane like it is on all -- as far as I
 8 know, all Gulfstream IVs. I have no idea whether or
 9 not that couch becomes a bed.

10 **Q. You told the American lawyer on 16:01:15**
 11 **January 15, 2015 a statement that you have repeated**
 12 **on multiple occasions: "I've been married to the**
 13 **same woman for 28 years. She goes with me**
 14 **everywhere."**

15 **Do you acknowledge making that statement? 16:01:29**

16 A. Yes. My wife goes with me everywhere 16:01:30
 17 today. These days, now that our daughter is grown
 18 up and went to high school and college, she travels
 19 with me everywhere. It's a rare, rare occasion when
 20 my wife doesn't travel with me. In fact, I have a
 21 condition of my speaking engagements that the
 22 speaking engagements have to pay for my wife to come
 23 with me.

24 I hate traveling alone. I almost never do 16:01:51
 25 it unless there is an absolutely essential reason

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1 for Carolyn to be somewhere else, such as taking
 2 care of her 96-year-old mother. But it is true, I
 3 travel with my wife.

4 **Q. In fact, the airplane manifests that have 16:02:07**
 5 **been produced reflect your having traveled on**
 6 **Jeffrey Epstein's airplane on ten separate occasions**
 7 **and on none of those occasions --**

8 A. Is that testimony, sir? 16:02:22

9 **Q. On none of those occasions -- 16:02:23**

10 MR. SCOTT: Wait a minute. 16:02:25

11 BY MR. SCAROLA: 16:02:25

12 **Q. -- is your wife reflected as having been a 16:02:26**
 13 **passenger at the same time that you are were on**
 14 **Jeffrey Epstein's airplane, right?**

15 MR. SCOTT: Object to the form. There's 16:02:32
 16 no timeframe or anything of that nature. If
 17 you can answer --

18 BY MR. SCAROLA: 16:02:35

19 **Q. All of the manifests that have been 16:02:35**
 20 **produced in this litigation, the ones that you say**
 21 **corroborate your testimony and exonerate you,**
 22 **demonstrate that you never flew on Jeffrey Epstein's**
 23 **plane in the company of your wife, correct?**

24 A. No. That's not true. I flew in the 16:02:50
 25 company of my wife and my daughter from Charleston,

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1 South Carolina to Guadalupe --

2 **Q. I'm asking about what the manifests show, 16:03:00**
 3 **sir --**

4 A. I'm telling you what -- 16:03:02

5 **Q. -- the ones that you say exonerate you. 16:03:03**

6 A. Well, I said that -- 16:03:05

7 **Q. Is there a manifest that shows that you 16:03:06**
 8 **and your wife were on Jeffrey Epstein's plane at the**
 9 **same time together?**

10 MR. SCOTT: Let me object to the -- 16:03:11

11 A. I don't know that. 16:03:13

12 MR. SCOTT: -- argumentative nature and 16:03:13
 13 compound nature. He's trying to answer your
 14 questions.

15 A. Let me go through each of the times -- 16:03:18

16 MR. SCOTT: There's nothing -- 16:03:19

17 THE WITNESS: Okay. Okay. 16:03:19

18 MR. SCOTT: There's nothing pending. Go 16:03:20
 19 ahead.

20 BY MR. SCAROLA: 16:03:21

21 **Q. Is there a manifest that shows that your 16:03:21**
 22 **wife ever accompanied you on a flight on Jeffrey**
 23 **Epstein's private airplane?**

24 MR. SCOTT: Let me object again. There's 16:03:30
 25 no reference to the timeframe or the relevant

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1 timeframe --

2 MR. SCAROLA: Any time ever. 16:03:34

3 A. My wife accompanied me on two occasions, 16:03:35

4 my nephew --

5 BY MR. SCAROLA: 16:03:39

6 **Q. Is there a manifest -- 16:03:39**

7 MR. SCOTT: You're cutting him off, 16:03:40

8 Counsel.

9 A. Let me finish. 16:03:41

10 MR. SCAROLA: He's not answering my 16:03:41

11 question.

12 MR. SCOTT: Yes, he is answering your 16:03:43

13 question.

14 A. My nephew accompanied me on one occasion. 16:03:45

15 My research assistant, Mitch Webber, accompanied me

16 on one occasion. My son or grandson, I'm not sure

17 which, accompanied me on one occasion.

18 And the occasions that I flew on Jeffrey 16:04:04

19 Epstein's plane were almost always business

20 occasions during a time when my daughter, Ella, was

21 in elementary school, if we're talking about the

22 relevant period of time. And during that period of

23 time, on occasion my wife did not fly with me.

24 BY MR. SCAROLA: 16:04:24

25 **Q. Is there -- 16:04:24**

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1 A. But let me emphasize -- let me emphasize 16:04:25

2 that the manifests that do exculp me, do not show me

3 flying with Virginia Roberts, they do not show me

4 flying with any young women.

5 They know that on every trip I took, there 16:04:35

6 was a business reason for it, there were other

7 people on the plane, and it is inconceivable that

8 during any of those periods of time, the lies that

9 Virginia Roberts told about me could have been true.

10 **Q. So it's your contention that no manifests 16:04:49**

11 **show you traveling outside the company of your wife;**

12 **is that correct?**

13 A. Said that again, no manifest -- 16:04:58

14 **Q. No manifest shows you traveling outside 16:04:59**

15 **the company of your wife?**

16 A. I'm confused. That's a double, triple 16:05:02

17 negative.

18 MR. SCOTT: Do you understand the 16:05:07

19 question?

20 THE WITNESS: I don't, no. 16:05:07

21 MR. SCOTT: Rephrase it. 16:05:09

22 BY MR. SCAROLA: 16:05:09

23 **Q. There is not a single manifest of the ten 16:05:10**

24 **that shows you as a passenger on Jeffrey Epstein's**

25 **plane that shows your wife there at the same time,**

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1 **correct?**

2 A. I am not aware that there are ten 16:05:18

3 manifests. I would be happy to look at the

4 manifests. I have explained --

5 **Q. Unfortunately -- 16:05:24**

6 A. -- each of the times -- 16:05:24

7 **Q. -- we won't have time to do that this 16:05:25**

8 **afternoon --**

9 A. -- I've been -- 16:05:27

10 **Q. -- but we will have time to do that 16:05:27**

11 **eventually.**

12 A. We will -- I welcome that time, because I 16:05:29

13 can give complete context to every single trip I

14 took. And if you're trying to convey the impression

15 that there was any occasion on which I had any

16 improper conduct while I was on that airplane, that

17 is a categorical lie.

18 **Q. What I am trying to do, sir, is to test 16:05:45**

19 **the veracity of your public assertions that you have**

20 **never traveled outside the presence of your wife.**

21 A. That is a lie. 16:05:57

22 **Q. That is what I'm trying to do. 16:05:57**

23 A. That is a lie, sir, a categorical lie. I 16:05:57

24 challenge you to find any statement where I said I

25 have never traveled outside the presence of my wife.

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1 **Q. Well, how about this -- 16:06:08**

2 A. Sir, find me that statement. 16:06:09

3 **Q. -- do you -- do you remember having -- 16:06:10**

4 **having stated publicly on multiple occasions that**

5 **you never received a message --**

6 A. No. 16:06:17

7 **Q. -- from Jeffrey Epstein? 16:06:18**

8 MR. SCOTT: Unless you can show them and 16:06:20

9 characterize them by date and time, you just

10 can't say here -- it's improper impeachment --

11 that you've done this ten times. It's just

12 improper completely.

13 BY MR. SCAROLA: 16:06:28

14 **Q. Can you answer the question -- 16:06:29**

15 MR. SCOTT: And it's overly broad. 16:06:29

16 BY MR. SCAROLA: 16:06:30

17 **Q. -- do you have any recollection of saying 16:06:30**

18 **that you never received a message?**

19 A. I did receive a message. 16:06:32

20 **Q. Do you have any recollection -- 16:06:34**

21 A. I have no recollection -- 16:06:35

22 **Q. -- of making that public statement that 16:06:36**

23 **you never received a message?**

24 A. I can't imagine me saying that. If I said 16:06:39

25 it, I was mistaken. I had one message, to my

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1 recollection.

2 **Q. Okay. Tell us about where that occurred. 16:06:43**

3 A. That occurred in my bedroom of Jeffrey 16:06:45

4 Epstein's home in Palm Beach. I was asked whether

5 I -- Palm Beach. I was asked whether I wanted a

6 massage. I had been asked repeatedly whether I

7 wanted a massage and I had said no. Then I was told

8 that they had a masseuse coming from Miami who was a

9 specialist of some kind, she was very good, she was

10 Russian, and she worked, I think, in the Russian

11 baths or something like that, and I agreed to have a

12 massage.

13 I regretted it. She massaged me in a very 16:07:25

14 tough and rough way. And she wanted to put her

15 knees on my shoulder and I said no. I immediately

16 called my wife when the massage was over and I told

17 her about the bad experience I had. And I said to

18 her, see, I really don't like massages. But my wife

19 likes massages. And she has had -- she has massages

20 frequently.

21 **Q. This massage occurred in your bedroom in 16:07:55**

22 **Jeffrey Epstein's house; is that correct?**

23 A. Not in my bedroom, in the bedroom that I 16:07:59

24 had been assigned, which was a guest bedroom. The

25 door was open. The -- a massage table was brought

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1 in. I kept my undergarments on. And I was massaged

2 maybe for 20 minutes or 25 minutes. And then -- and

3 then she left and I had an unpleasant experience and

4 I called my wife and I told her about it.

5 **Q. Was the bedroom to which you were 16:08:28**

6 **assigned, which you previously referred to as your**

7 **bedroom --**

8 A. No, no. I said "my bedroom" in the sense 16:08:34

9 that I was in it.

10 **Q. Was the bedroom to which you were assigned 16:08:38**

11 **in the private section of the residence?**

12 MR. SCOTT: Do you understand the 16:08:46

13 question?

14 A. Yeah, let me explain exactly. This 16:08:47

15 requires a long answer.

16 There -- when you walk into Jeffrey 16:08:52

17 Epstein's house, there are two areas. If you walk

18 up the left side of the stairway, there are guest

19 bedrooms, three or four guest bedrooms. Those were

20 assigned to people like Senator George Mitchell,

21 Ehud Barak, prominent guests who would stay in his

22 house. Each one had its own bathroom and its own

23 bed. I stayed there with my wife for a period of

24 time.

25 But then there was another area of the 16:09:26

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1 house, which I have never been in, ever, and which

2 nobody was allowed basically into, which was Jeffrey

3 Epstein's part of the house, which contained his

4 bedroom and whatever other rooms. I've read about

5 them, but I've never seen them. So it was in the

6 guest area of the house over the kitchen.

7 BY MR. SCAROLA: 16:09:45

8 **Q. Who told you no one was allowed in that 16:09:47**

9 **area of the house?**

10 A. I was told by the people that that was 16:09:50

11 off -- off limits, that that was Jeffrey's --

12 **Q. Which people? 16:09:54**

13 A. Ghislaine, Kellen, Sarah Kellen, that that 16:09:56

14 was Jeffrey's area of the house and that the guests

15 were limited to the public areas of the house and

16 the -- and I think that's common in many houses when

17 you go and stay at somebody's house, you don't go

18 into their bathrooms and their bedrooms.

19 **Q. And it's common for people to tell you, 16:10:11**

20 **you're not allowed in this area of the house?**

21 A. People -- people -- guests are not 16:10:15

22 supposed to go to that area of the house.

23 **Q. No, sir. That's my question. Is it 16:10:19**

24 **common for you to be told --**

25 A. Yes. 16:10:22

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1 **Q. -- when you enter somebody's house, you're 16:10:22**

2 **not allowed to go into this portion of the house?**

3 A. Oh, yes. I just recently went to a -- a 16:10:26

4 breakfast at somebody's house after Yom Kippur and I

5 wanted to show friends of mine the art that was in

6 the house and I started walking down the house and

7 the waiter said, oh, I'm sorry, you're not allowed

8 in -- in that part of the house, that's the private

9 residence. And so I had to turn around and show my

10 friends the art that was in the public area, not the

11 private area --

12 **Q. Jeffrey Epstein's art consisted of 16:10:54**

13 **photographs of young naked girls all over the house,**

14 **right?**

15 A. Are you testifying? That's false. I 16:11:01

16 never saw any such thing. Ever. Never saw a

17 picture, with one exception, of a nude. The one

18 exception was a sepia print of Rodin's model that

19 appeared on one of his desks.

20 But in all the times I was at Jeffrey 16:11:23

21 Epstein's house in Palm Beach, the one time I was in

22 his house in -- on the island, certainly the one

23 time in -- in the ranch because there was nothing

24 there, it was just a construction site, I never saw

25 a picture -- or in his house in New York, I never

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1 saw a picture of a naked woman, ever.

2 **Q. The notice for deposition with which you 16:11:45**

3 **were served both initially a few months ago and for**

4 **today's deposition is a notice of deposition duces**

5 **tecum. Could we please have the documents that**

6 **you --**

7 MR. SCOTT: We have a disk. I'll hand it 16:12:01

8 to you at the end of the depo with everything

9 that's responsive --

10 MR. SCAROLA: I would like it now, please. 16:12:04

11 MR. SCOTT: Let the record reflect I'm 16:12:13

12 handing the disk.

13 MR. SCAROLA: Thank you. 16:12:16

14 MR. SIMPSON: Just for the record, it's a 16:12:17

15 disk of all the documents that have been

16 produced in the case subject to the objections

17 and privilege assertions that have been made in

18 the case.

19 MR. SCAROLA: All right. And so that the 16:12:25

20 record is clear, and hopefully you will be able

21 to make these arrangements by tomorrow, one of

22 the things that we want are the original of the

23 handwritten documents so that we have an

24 opportunity to examine those.


25 MR. SCOTT: I'll talk to him -- 16:12:40

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CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF BROWARD

I, the undersigned authority, certify
that ALAN M. DERSHOWITZ personally appeared
before me and was duly sworn on the 15th day of
October, 2015.
Signed this 15th day of October, 2015.


Kimberly Fontalvo
KIMBERLY FONTALVO, RPR, FPR, CLR
Notary Public, State of Florida
My Commission No. EE 161994
Expires: 2/01/16

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1 MR. SCAROLA: Calendars. 16:12:41

2 MR. SCOTT: -- whether we comply or not. 16:12:43

3 We'll discuss it off the record.

4 MR. SCAROLA: The flight logs, anything 16:12:44

5 that's in handwritten form.

6 And we will reconvene tomorrow. What time 16:12:50

7 would you like to start?

8 MR. SCOTT: 9:30. 16:12:53

9 THE WITNESS: The earlier the better. 16:12:54

10 9:00.

11 MR. SCAROLA: 9:00? 16:12:55

12 MR. SCOTT: 9:00, good. 16:12:56

13 MR. SCAROLA: 8:00, want to go to 8:00? 16:12:57

14 MR. SCOTT: No, 9:00 is fine. 16:12:59

15 MR. SCAROLA: Okay. Thank you. 16:13:00

16 VIDEOGRAPHER: Going off the record. The 16:13:00

17 time is approximately 4:13 p.m.

18 (The proceedings ADJOURNED at 4:13 p.m.,

19 and will continue in Volume 2.)

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CERTIFICATE OF REPORTER

STATE OF FLORIDA
COUNTY OF BROWARD

I, KIMBERLY FONTALVO, Registered
Professional Reporter, do hereby certify that I
was authorized to and did stenographically report
the foregoing videotape deposition of ALAN M.
DERSHOWITZ; pages 1 through 170; that a review of
the transcript was requested; and that the
transcript is a true record of my stenographic
notes.

I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
of the parties, nor am I a relative or employee
of any of the parties' attorneys or counsel
connected with the action, nor am I financially
interested in the action.

Dated this 15th day of October, 2015.

KIMBERLY FONTALVO, RPR, FPR, CLR

October 15, 2015

Re: Bradley Edwards, etc. v. Alan M. Dershowitz

Please take notice that on the 15th day of October, 2015, you gave your deposition in the above cause. At that time, you did not waive your signature.

The above-addressed attorney has ordered a copy of this transcript and will make arrangements with you to read their copy. Please execute the Errata Sheet, which can be found at the back of the transcript, and have it returned to us for distribution to all parties.

If you do not read and sign the deposition within a reasonable amount of time, the original, which has already been forwarded to the ordering attorney, may be filed with the Clerk of the Court.

If you wish to waive your signature now, please sign your name in the blank at the bottom of this letter and return to the address listed below.

Very truly yours,

KIMBERLY FONTALVO, RPR, FPR, CLR
 Phipps Reporting, Inc.
 1615 Forum Place, Suite 500
 West Palm Beach, Florida 33401

I do hereby waive my signature.

 ALAN M. DERSHOWITZ

ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

In Re: BRADLEY EDWARDS, ETC. V. ALAN M. DERSHOWITZ

ALAN M. DERSHOWITZ

October 15, 2015

PAGE	LINE	CHANGE	REASON
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Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

 Date ALAN M. DERSHOWITZ

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