

EXHIBIT 14
(Filed Under Seal)

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

4 CASE NO. CACE 15-000072

5 BRADLEY J. EDWARDS and PAUL G. CASSELL,

6 Plaintiffs/Counterclaim Defendants,

7 vs.

8
9 ALAN M. DERSHOWITZ,

10 Defendant/Counterclaim Plaintiff.
11 _____/

12
13
14 VIDEOTAPED DEPOSITION OF

15 PAUL G. CASSELL

16 TAKEN ON BEHALF OF THE DEFENDANT

17 VOLUME I, PAGES 1 to 151

18
19
20 Friday, October 16, 2015

21 1:33 p.m. - 4:31 p.m.

22
23 110 Southeast 6th Street
24 110 Tower - Suite 1850
25 Fort Lauderdale, Florida 33301

Theresa Tomaselli, RMR

1 2014, you had a sufficient basis under the Federal Rules
2 of Procedure and applicable ethical rules to allege that
3 anyone who got a massage at Mr. Epstein's residences had
4 abused minors?

5 A. No.

6 Q. What -- I'm gonna back up now. With respect
7 again to other minors, as of December 30th, 2014, had
8 anyone -- had any young woman, other than -- we will
9 put Virginia -- I'm going to ask about Virginia Roberts
10 separately.

11 A. Okay.

12 Q. -- had any other young woman told you she had
13 been abused [REDACTED]

14 A. No other young woman had told me that, no.

15 Q. Had -- as of that date, had anyone told you
16 that [REDACTED] had abused other minors?

17 A. Had --

18 MS. McCawley: I'm going to object for a
19 moment here. To the extent that you're going to
20 be answering a question that requires you to
21 divulge any attorney/client communication with
22 Virginia Roberts, I have a standing objection
23 that I'm putting on the record right now.

24 Virginia Roberts does not waive her
25 attorney/client privilege with her lawyers, and

1 they are not entitled to testify as to
2 information that she intended to be confidential
3 that she communicated to her lawyers.

4 MR. SCAROLA: And I would instruct you not to
5 answer the question on that basis.

6 MR. SIMPSON: All right.

7 BY MR. SIMPSON:

8 Q. I -- I disagree with the position on the
9 privilege, but I will -- you're going to follow the
10 instruction not to answer those questions?

11 A. I am.

12 Q. Okay. I want to put then aside, Virginia
13 Roberts. Had anyone else as of December 30th, 2014,
14 told you that [REDACTED] had abused any minor,
15 other than Virginia Roberts?

16 A. No one -- no other -- no other person -- no
17 other person had spoken to me and told me that directly,
18 no.

19 Q. And when you say, no other person, I'm -- I'm
20 including not just any -- any victims of Mr. Epstein,
21 but anyone else. No one had said to you, I have
22 knowledge that [REDACTED] abused a minor, other
23 than Virginia Epstein [sic]; is that -- Virginia
24 Roberts; is that correct?

25 MR. SCAROLA: Let me ask you for a

1 A. If that's all you have, obviously not.

2 MR. SIMPSON: Okay.

3 MR. SCAROLA: Thank you.

4 MR. SIMPSON: We will break then and we will
5 talk off the record about logistics for tomorrow.

6 MR. SCAROLA: Okay.

7 THE VIDEOGRAPHER: We are going off the video
8 record, 4:31 p.m.

9 (Witness excused.)

10 (Deposition was adjourned.)

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