

# EXHIBIT 14

(Filed Under Seal)

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/Counterclaim Defendants,

vs.

ALAN M. DERSHOWITZ,

Defendant/Counterclaim Plaintiff.

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VIDEOTAPED DEPOSITION OF

PAUL G. CASSELL

TAKEN ON BEHALF OF THE DEFENDANT

VOLUME I, PAGES 1 to 151

Friday, October 16, 2015

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

110 Southeast 6th Street  
110 Tower - Suite 1850  
Fort Lauderdale, Florida 33301

Theresa Tomaselli, RMR

ESQUIRE DEPOSITION SOLUTIONS

(954) 331-4400

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.)