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November 5, 2019

ECF

Hon. Katherine Polk Failla
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Jane Doe v. Darren K. Indyke and Richard D. Kahn, in their capacities as the Executors of the Estate of Jeffrey E. Epstein, 1:19-cv-08673-KPF*

Dear Judge Failla:

We represent Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, "Defendants"), in the referenced action. We write in response to Plaintiff's counsel's November 1, 2019 letter (ECF # 16), which Ms. Fink submitted without first meeting and conferring with us, requesting the Court mark this and five other S.D.N.Y. actions pending before five different judges¹ related and assigned to a single judge.

If approved, Plaintiff's request would have serious consequences for this and the other subject actions and parties thereto. Accordingly, we respectfully request that Defendants and all other parties to the actions—which so far include 7 different plaintiffs and 20 different defendants—have thirty (30) days to respond to Plaintiff's request. That time would permit the various parties to the lawsuits to meet and confer regarding potential consolidation, thereby conserving judicial resources by reducing or eliminating the issues in dispute. The requested time would also provide the parties sufficient time to otherwise respond to Plaintiff's request.

¹ See *VE v. Nine East 71st Street, et al.*, 1:19-cv-07625 (AJN); *Jane Doe 1 and 2 v. Estate of Jeffrey Epstein, et al.*, 1:19-cv-07675 (GBD); *Katlyn Doe v. Darren K. Indyke and Richard D. Kahn as Joint Personal Representatives of the Estate of Jeffrey E. Epstein, et al.*, 1:19-cv-07771 (PKC); *Priscilla Doe v. Darren K. Indyke and Richard D. Kahn as Joint Personal Representatives of The Estate of Jeffrey E. Epstein, et al.*, 1:19-cv-07772 (ALC); and *Lisa Doe v. Darren K. Indyke and Richard D. Kahn as Joint Personal Representatives of The Estate of Jeffrey E. Epstein, et al.*, 1:19-cv-07773 (ER).

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Respectfully submitted,

s/Bennet J. Moskowitz
Bennet J. Moskowitz

Cc: The Honorable Colleen McMahon
The Honorable Alison J. Nathan
The Honorable George B. Daniels
The Honorable P. Kevin Castel
The Honorable Andrew L. Carter
The Honorable Edgardo Ramos
Arick W. Fudali, Esq.
Bradley James Edwards, Esq.
Brittany Henderson, Esq.
Stan Pottnger, Esq.