UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANASTASIA DOE,

                        Plaintiff,

        v.

DARREN K. INDYKE AND RICHARD D.
KAHN, AS CO-EXECUTORS OF THE
ESTATE OF JEFFREY E. EPSTEIN.,

                        Defendants.

Case No. 1:19-cv-11869-MKV-DCF

JOINT STIPULATION AND [PROPOSED] ORDER STAYING ACTION   *DF*

WHEREAS independent claims administration experts have designed and are implementing the Epstein Victims' Compensation Program (the "Program") to resolve sexual abuse claims against decedent Jeffrey E. Epstein ("Decedent") in a non-adversarial alternative to litigation; and

WHEREAS Plaintiff Anastasia Doe ("Plaintiff," and together with Defendants, Darren K. Indyke and Richard D. Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein, the "Parties"), seeks to participate in the Program; and

WHEREAS the Parties seek to preserve their resources and judicial economy by staying this action unless and until Plaintiff elects to resume the litigation and requests the stay be lifted; and

WHEREAS should Plaintiff resolve her claims against Defendants via the Program, the Parties will thereafter promptly discontinue this action with prejudice.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that:

   1.   The captioned action is hereby stayed pending further Order of the Court.

42501282v1

2.   After the lifting of the stay, if any, the Parties will confer on a schedule for the

remaining discovery in this action.

Dated: June 12, 2020
        New York, New York

Respectfully submitted,

EDWARDS POTTINGER LLC

By: */s/ Brad Edwards*
       Brad Edwards
       425 North Andrews Avenue, Suite 2
       Fort Lauderdale, Florida 33301
       Tel: (954) 524-2820
       brad@epllc.com

Attorneys for Plaintiff

TROUTMAN SANDERS LLP

By: */s/Bennet Moskowitz*
       Bennet J. Moskowitz
       875 Third Avenue
       New York, NY 10022
       (212) 704-6000
       bennet.moskowitz@troutman.com

Attorneys for Defendants

The parties are directed to submit a joint status report no later than 8/14/2020.

Date: _____ June 15 , 2020
        New York, New York

HON. DEBRA C. FREEMAN
United States Magistrate Judge

2