

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re: :
DAVIES, TEALA, : Docket #1:19-cv-10788-
: GHW-DCF

Plaintiff, :
- against - :
INDYKE, DARREN K. et al, : New York, New York
: May 22, 2020

Defendants. :
----- : TELEPHONE CONFERENCE

PROCEEDINGS BEFORE
THE HONORABLE JUDGE DEBRA C. FREEMAN,
UNITED STATES DISTRICT COURT MAGISTRATE JUDGE

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Proceedings conducted telephonically and recorded by
electronic sound recording;
Transcript produced by transcription service

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<u>Witness</u>	<u>Direct</u>	<u>Cross</u>	<u>Re-Direct</u>	<u>Re-Cross</u>
None				

E X H I B I T S

<u>Exhibit Number</u>	<u>Description</u>	<u>ID</u>	<u>In</u>	<u>Voir Dire</u>
None				

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2 HONORABLE DEBRA C. FREEMAN (THE COURT): All
3 right, so this is Judge Freeman. And if I've got this
4 calendared right, this should be a conference in three of
5 the cases involving the Jeffrey Epstein Estate: Jane Doe
6 v. Indyke, 19-cv-10653; Mary Doe v. Indyke, 19-cv-10758;
7 and Davies v. Indyke, 19-cv-10788.

8 Anybody have a different understanding as to why
9 you're here?

10 (No response.)

11 THE COURT: No. Can I have your appearances,
12 starting with the first of the cases that I listed, the
13 Jane Doe case?

14 MS. MARIANN M. WANG: So for plaintiffs, Mariann
15 Wang. And I believe my colleague, Dan Mullkoff, is on the
16 line. And we represent the plaintiffs in all three cases,
17 so -- (Stopped talking.)

18 THE COURT: Okay. And on defendants' side?

19 MR. BENNET J. MOSKOWITZ: Good morning, your Honor.
20 Bennet Moskowitz, Troutman Sanders, for the co-executors. And
21 on the line should be my colleagues, Matthew Aaronson, Valerie
22 Sirota, and Molly DiRago. And that's true for all three of
23 the actions.

24 THE COURT: Okay. So that would count for 1, 2, 3,
25 4, 5, 6 people. Is my law clerk on?

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MS. HANNAH MARTIN: Yes, Judge, I'm here.

3

THE COURT: Okay, that's Hannah Martin. She's one
of my clerks. There should be still more people on, based on
what I heard when I joined the call. Is there anyone else on
the call?

7

MS. EMILY FALL: Hi. My name is Emily Fall; I'm a
reporter with 3M Canny 4 Productions. I'm also on the call.

9

THE COURT: Okay, is there anyone else on?

10

MR. JAMES HILL: Your Honor, this is James Hill.
I'm a reporter with ABC News, and I am monitoring the call and
will keep my line on mute.

13

THE COURT: Okay. I've slightly lost count. If
there's anyone else on the call from the public or press, you
are, of course, welcome to listen in. I would appreciate it
if you would keep your phones on mute, which you seem to have
been doing until I asked who was here.

18

Do we have a court reporter? I know that in one of
the conferences scheduled today -- it may have been the one
that's at 11 o'clock -- there was a request to have a court
reporter. No?

22

All right. So the conference is being recorded
through the AT & T conference system. And if anyone wants a
transcript, you can get it through us through that system.
Because someone may be trying to transcribe it from an audio

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2 recording, if you do speak, please state your name before you
3 speak so someone can keep the voices straight and be able to
4 make a transcript that makes sense if there should be a need.

5 All right, so what I thought I would do, rather than
6 have a conference in all of the cases that I have in front of
7 me for supervision, I thought I would take them in clusters
8 where issues had arisen. In each of these three cases there
9 was a consent letter filed for an extension of time. And even
10 though it was on consent, I thought I would hear from you as
11 to this concept of an informal stay and just what was
12 happening. And I don't mind a 30-day extension of deadlines,
13 but I wanted to get a sense of where things were with respect
14 to potential settlement. And, you know, I read in the news as
15 much as anyone else, but that doesn't really tell me the full
16 story. So can I just hear from plaintiffs' counsel about
17 general status here?

18 MS. WANG: Sure, your Honor. This is Mariann Wang
19 again. So we have made some progress in terms of the
20 litigation; that is, we've exchanged discovery responses,
21 interrogatory responses --

22 THE COURT: Hold on a second. Did someone join the
23 call? No? I want to make sure --

24 MS. LAURA MENNINGER: Hi. I'm just -- I'm listening
25 in, your Honor. It's counsel for another party.

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THE COURT: Oh, that's fine. Okay.

3

MS. WANG: Can I just ask counsel for which party?

4

Just to know.

5

MS. MENNINGER: Oh, I'm sorry.

6

THE COURT: Are you counsel in another case that's pending in front of me?

8

MS. MENNINGER: Yes, your Honor. I have a hearing in front of you at nine o'clock AM. This is Laura Menninger for Ms. Maxwell.

11

THE COURT: At nine o'clock? You must mean 11 o'clock New York time?

13

MS. MENNINGER: Oh, I'm sorry, yes. I'm in Colorado. Yeah, 11 o'clock Eastern time. Thank you.

15

THE COURT: Okay. You're welcome.

16

All right, you were saying, counsel?

17

MS. WANG: Sure. So, again, Mariann Wang for plaintiffs. So we have made some progress. We're also -- we were kind of on the cusp of about to exchange a lot of paper discovery and starting to talk about depositions.

21

And so there was progress being made on the litigation side. At the same time that aspect of litigation was not -- was hindered a bit because of the pandemic, just in terms of communications and timeliness and ease of gathering things because of, obviously, not being able to

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2 meet in person with the clients. We had also started to
3 have some essentially, I guess, one would say some
4 conflicts potentially with defense counsel about whether
5 and how depositions can proceed, in person or remotely.

6 In any event, because of the kind of -- the
7 combination of perfect storm of both the hindrance of the
8 pandemic and logistics -- should I stop?

9 THE COURT: Yes. Did someone just join the call?

10 MALE: Yes. Inner City Press. Not a participant.

11 THE COURT: Okay. Fine. If you could keep your
12 phone on mute, I would appreciate that.

13 MALE: I will. Thanks.

14 THE COURT: Go ahead, Ms. Wang.

15 MS. WANG: Again, Ms. Mariann Wang. And, at the
16 same time, our understanding that in the Virgin Islands
17 there seems to be potential progress and potentially in the
18 short term a possibility, really, of getting the claims
19 resolution process started. We just felt that it might
20 make sense to put a pause and see whether that would have
21 some, you know, traction and whether we could get going on
22 that before essentially, really, both working extremely
23 hard and potentially draining resources on the estate front
24 of, you know, having apparently four or five lawyers
25 working nonstop on fighting us to some degree. It just

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2 seemed to make sense to hit pause for a little while. So
3 that's the basic concept.

4 THE COURT: I will say on defendants' side you
5 seem to have four attorneys on this call. I hope you're
6 keeping costs under control under the circumstances.

7 So I gather what you want to do is you don't want
8 an extension of discovery; what you want to do is basically
9 have a hiatus of discovery and then put the same amount of
10 time back on the clock as you had before? You want to stop
11 everything for 30 days and have another 30 days thereafter
12 to finish discovery if you need it?

13 MS. WANG: That was the idea, yes, your Honor.

14 THE COURT: How much optimism do you have during
15 this 30-day period this process is going to get rolling and
16 you'll be able to enter into it and get these cases
17 resolved?

18 MS. WANG: Well, this is where it is a little bit
19 trying to balance. And I think that -- I mean, I have -- I
20 guess I probably would have more optimism -- I have
21 optimism that in 30 days we will know much more and we will
22 be able to then -- at least that's my hope -- be able to
23 really say okay, let's turn back to the litigation; or,
24 okay, let's really, you know, put this on hold/pause for
25 more amount of time because it looks like that's going.

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2 That's my hope, at least. Perhaps the estate would know
3 better, in fact, what -- you know, whether or not my
4 optimism is warranted.

5 MR. MOSKOWITZ: Your Honor, Bennet Moskowitz. If
6 I may, I'm happy to provide an update about the Epstein
7 Victims Compensation Program.

8 THE COURT: I'd appreciate it.

9 MR. MOSKOWITZ: Sure. And I'd first, since you've
10 raised it, like to address the issue of keeping costs --
11 and I can assure your Honor that the sole reason the
12 attorneys are on who are on is because it is more efficient
13 in terms of managing all the 15 or so active cases for only
14 those who are on to be on rather than have lengthy back-
15 and-forth follow-ups with each other. And, in fact, we are
16 very concerned about litigation costs. And the people
17 driving those costs have been various plaintiffs' firms. I
18 will not necessarily pin that on Ms. Wang, as she is
19 actually trying to be reasonable here with the stay of some
20 sort, although -- which I'll get to -- we disagreed on how
21 to best do that.

22 But it bears mentioning the biggest drivers have
23 been the plaintiffs' firms, including making the estate
24 fight for months over whether they can get punitive
25 damages, which Judge Engelmayer in two cases ruled that no,

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2 they can't; and as we've been saying all along, it's black
3 letter law. And those are two of the cases on which we're
4 meeting for you now. So I'm surprised to hear any comment
5 by plaintiffs' counsel attributing cost concerns to us.
6 The other culprit is the U.S. Virgin Islands attorney
7 general, which I'll get to.

8 But to get back to the program, we are confident
9 that the program will commence by June 15, at the latest.
10 To date, counsel for around 69 individual claimants have
11 come forward, including through the U.S.V.I. Probate Court,
12 in support of the program. We believe that figure
13 constitutes the vast majority of claimants. In fact, we
14 are only aware of one claimant through her counsel who has
15 stated that she does not intend to participate. That's one
16 of the state court plaintiffs, not one of the cases before
17 your Honor. And I don't even know if that's the current
18 position of that individual.

19 As your Honor is probably aware, we're now up to
20 seven Southern District of New York plaintiffs in three
21 lawsuits who have formally stayed their actions pending
22 their participation in the program, including most recently
23 Maria Farmer, whom Boies Schiller represents. Ms. Wang's
24 three clients, of course, as they put it, sought this
25 informal stay, and they intend to participate in the

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2 program. The program administrator and the designers have
3 nearly finalized the protocol for the program. Recall
4 that's the nuts and bolts of how the program actually
5 works. They've done that in close consultation with
6 claimants' counsel and with input from the co-executors.

7 So to recall, the only reason that the program did
8 not formally commence several months ago, which is what we
9 wanted, which would have avoided all these litigation
10 costs, is that in January 2020, the U.S. Virgin Islands
11 attorney general, who again does not represent a single
12 alleged victim, unilaterally imposed liens on the estate's
13 bank accounts in the Virgin Islands, freezing then-
14 available funds for administration of the estate and
15 implementation of the program. That caused a huge delay
16 solely attributable to the attorney general of the Virgin
17 Islands.

18 I am pleased to report that just a few days ago,
19 the estate and the U.S. Virgin Islands attorney general
20 have reached a resolution in principle, which I understand
21 would involve the attorney general finally stepping aside
22 so the program can finally formally proceed. There are a
23 few, I'd say, less contentious matters that still need to
24 be ironed out in that regard, but we expect that that
25 resolution would be finalized by next week and that we

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2 would notify the U.S.V.I. Probate Court about that sometime
3 next week. If, however, something unexpected occurs, and
4 because the need for the program has grown increasingly
5 urgent, and with the overwhelming support of claimants'
6 counsel, the co-executors in any event intend to seek
7 commencement of the program on June 15, absent some
8 contrary direction from the U.S.V.I. Probate Court, which
9 we do not expect.

10 And, indeed, it bears mentioning that during the
11 February 4 hearing at the U.S.V.I. Probate Court, the judge
12 said, quote, "I think we agreed that everybody believes
13 this program is a great program," end quote. So, again,
14 the sole holdup here has been the attorney general of the
15 Virgin Islands. So I am confident in saying that the
16 program will formally move forward soon, that it will have
17 an overwhelmingly successful participation rate and be a
18 great success, which we always expect and that's what
19 everyone's been working hard towards.

20 Meanwhile, I agree with Ms. Wang -- and, actually,
21 counsel for Maxwell has said this in a letter to the Court,
22 as well -- that every dollar spent on litigation, which
23 again plaintiffs' counsel in some of the other matters
24 before your Honor have been driving up through, you know,
25 unnecessary motions, unnecessary requests to make discovery

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2 motions, that is money that will never possibly be
3 available to fund the program, which we have been trying to
4 do since day one. You may recall, your Honor, that it was
5 plaintiffs' counsel, different plaintiffs' counsel, who
6 resisted stays of litigation. So, again, I was surprised
7 to hear the comments about cost concerns.

8 But we agree with where Ms. Wang is at this now,
9 it would be a disservice to claimants and a waste of
10 judicial resources during a time when such resources are,
11 as evidenced by, you know, this conference call, stretched
12 very thin due to the unprecedented situation we find
13 ourselves in with the pandemic, for money to be spent on
14 litigation. It was for that reason that when Ms. Wang
15 approached us, which also bears mentioning that they
16 approached us about this concept of an informal stay, we
17 proposed that we do the same stay that we've done in some
18 of the other actions before your Honor, which if your Honor
19 recalls, those orders -- basically, people can lift them at
20 any time if they decide they don't want to participate in
21 the program or for whatever reason. They can go to your
22 Honor and request a lift of the stay. Ms. Wang didn't
23 agree to that; and, therefore, we, you know, agreed to what
24 was offered, which was this kind of informal stay, followed
25 by a --

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THE COURT: Hold on one second. Did someone join

the call?

4

MALE: Hello. Member of the press here.

5

THE COURT: Okay. Fine.

6

I'm sorry, please continue.

7

8

MR. MOSKOWITZ: So I was about to wrap up, your

Honor. So, in any event, you know, like I said, I'm

pleased to report that I have confidence the program will

10 start soon, matter of weeks, not months, finally. And I

11 agree with the call's concerns, which is that all these

12 actions to be stayed for people that intend to participate

13 in the program, which as I understand it, is every

14 plaintiff in every action that's before your Honor,

15 including the ones that we're here talking about now.

16

THE COURT: Okay. So on the deadlines, what

17 you're looking for -- correct me if I'm wrong on this --

18 for fact discovery, you want deadline extension from

19 July 10 to October 8, is that right?

20

MS. WANG: I believe that's correct. There's a

21 letter --

22

THE COURT: That's -- oh, I'm sorry, I may be

23 looking at the wrong -- no, I think so. Yes. That's not a

24 30-days?

25

MS. WANG: I apologize, your Honor. This is --

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2 THE COURT: The letter -- I pulled up the letter
3 in, I think it's the same letter that was written in all
4 three cases. And it says in the letter that you're looking
5 for -- oh, I'm sorry, you're looking for 90 days. You're
6 looking for 90 days and an extension --

7 MS. WANG: That's correct.

8 THE COURT: -- on the answer deadline for 30.

9 MS. WANG: Yes, your Honor. And if I may -- this
10 is plaintiffs' counsel, Mariann Wang, again. The idea was
11 for this informal stay of 30 days and essentially to kind
12 of reassess at that time; and, therefore, we were building
13 in a larger cushion at the back end.

14 And just for the record, for purposes of the
15 record, I just will have to say that I dispute some of the
16 things that Mr. Moskowitz said. But I don't think it's
17 worth going into now. I think there was a lot of effort on
18 the estate's part not to produce any documents or cooperate
19 until it decided that it could put four or five attorneys
20 on this matter.

21 But, in any event, for purposes of what's going on
22 right now, that is correct. The idea was to build in a
23 little bit of extra cushion at the back end.

24 THE COURT: So let me see if I understand this.
25 What you're saying is kick all the deadlines out by 90

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2 days, discovery deadlines; don't do anything for 30 -- and
3 some time has already passed since you wrote the letter,
4 perhaps you're not even looking at 30 anymore -- and then
5 once those 30 days go by, start up again but at a more
6 leisurely pace because you have another 60 days?

7 MS. WANG: No, your Honor. The idea would be in
8 30 days we would report back to the Court about what the
9 best approach -- what the best approach would be --

10 THE COURT: Let me ask again if someone's joined
11 the line. Has someone joined on the line? Hello? Those
12 beeps might mean someone left or someone joined.

13 Let me just make sure defense counsel is still
14 present. Mr. Moskowitz?

15 MR. MOSKOWITZ: I'm here, your Honor, Bennet
16 Moskowitz.

17 THE COURT: Okay. All right. I haven't set this
18 up with the computer dashboard that identifies people and
19 lets me know who joined and who dropped. We're just doing
20 this as a straight phone call, so that's why I keep asking
21 the questions, to try to figure out who's present in my
22 courtroom, so to speak. If a lawyer who's making an
23 argument suddenly gets up and walks out of the courtroom,
24 that's something I can see; but on the phone call, I have
25 to just make sure that that's not what happened, you know,

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2 through some kind of dropped call or something.

3 Okay, so you were saying, counsel? I'm sorry.

4 MS. WANG: Yes, of course. So, your Honor, the
5 idea was really basically a stay for 30 days and then
6 essentially an opportunity to reassess and confer with
7 opposing counsel and basically report to the Court about
8 the next steps of, you know, whether we are going back
9 into, you know, full-on litigation because everything seems
10 to be falling apart in the other -- in the other method of
11 resolution; or if, you know, it would appear that we can go
12 back or we can even enter into a more formal permanent
13 stay.

14 And to be clear, the reason I didn't like the
15 others -- and which -- and my clients were not amenable to
16 it is that my understanding is and the way it appeared is
17 that those other actions are essentially stays that don't
18 allow to pick up as easily. If your Honor prefers a
19 different method of approach, I'm happy to confer with my
20 clients and opposing counsel and see if there's, you know,
21 a different method of doing this. But the main thing from
22 my clients' perspective is the ability, essentially to, you
23 know, step back into litigation full bore if things are
24 seeming to not go in the right direction. I'm very glad to
25 hear -- it's the first I'm hearing from Mr. Moskowitz,

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2 although I had asked him earlier about, you know, news on
3 the V.I. proceeding -- I'm glad to hear that there is
4 progress. And this is the first I'm hearing of this
5 June 15 start time.

6 THE COURT: Okay. So I am still not quite
7 understanding your letter in light of what you're saying,
8 because you wrote the letter May 11. So if I had granted
9 it immediately upon its receipt, your informal stay would
10 have lasted until June 10. And then if what you say is it
11 would have given you an opportunity to report back shortly
12 thereafter -- let's say you would have reported back to me
13 by, say, June 12 or maybe June 15, if not June 10, you're
14 asking for an extension, based on this letter, to submit a
15 joint status report regarding, including, you know, among
16 other things, the progress of settlement discussions, to be
17 extended from June 1 to August 31. August 31 is not in and
18 around the middle of June.

19 Why don't I just kick out the dates by some
20 reasonable period of time from now and ask for a status
21 report by a certain date? And if you find that you still
22 need more time because, you know, things are logistically
23 difficult to get done because of the pandemic or something,
24 you can let me know, and I'll kick out the dates
25 specifically so that you can have a hiatus and save

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2 resources and still have time on the clock to get discovery
3 done if you need it. But some of these dates aren't quite
4 making sense to me, and I'm not sure I'm understanding why
5 the 90 is necessary, why we need more time than the hiatus
6 time.

7 And if the more time is needed because you're
8 having problems agreeing on whether depositions can proceed
9 by remote means, I'll tell you what I'm telling everyone
10 else in the city of New York who's trying to litigate cases
11 right now, which is learn how to take depositions by remote
12 means. Everybody is learning, and the providers have gone
13 up that learning curve, and things seem to be moving pretty
14 well. I'm not forcing people's hands, but I am strongly
15 urging it. And it seems to be pretty successful. And if
16 you're in that kind of situation where you're trying to
17 negotiate protocol for remote depositions, I can give you a
18 case cite that I've been passing around. The parties don't
19 even know, I'm sure, that I've been passing it around. One
20 of my colleagues sent around a proposed remote deposition
21 protocol that litigants had submitted in a case, didn't
22 bless it, didn't endorse it. There was particular provider
23 mentioned, and certainly the Court's not endorsing any
24 particular provider or anything, but it showed some
25 thought. And I've been passing this citation onto other

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2 lawyers as something to glance at as maybe giving rise to
3 ideas and having a basis for discussion. I thought it
4 showed that some time and effort was put into considering
5 the issues that can arise. So let me give you that
6 citation. It's *Compus Productions International v. Charter*
7 *Communication*. It's 18-cv-12296. It's a case before Judge
8 Marrero and Magistrate Judge Moses, and it's Docket 51 in
9 that case, 18-cv-12296. Again, I'm not blessing it; I'm
10 just pointing it out as people wrestle with these kinds of
11 concepts.

12 But so why don't I just extend your deadlines
13 somewhat? It's now already May 22, so I could kick them
14 out to, let's say -- or by 45 days or something like that;
15 ask for a status report by the middle of June; and you'll
16 tell me what's going on. And the reason for me to kick it
17 out is with the understanding that you want to pause
18 things, try to preserve resources, and I'm putting another
19 45 days at the end of the schedule to enable you to get
20 things done. And you can, you know, map out a deposition
21 schedule if you have to for that time. And if you run into
22 logistical problems, you can get back to me and tell me
23 what those logistical problems are. Or maybe even 60.
24 But, you know, what you put out here doesn't seem to quite
25 hold together.

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2 MS. WANG: This is plaintiffs' counsel. Fair
3 enough, your Honor. That makes perfect sense from our
4 perspective.

5 THE COURT: Okay, look, so here's what I'm going
6 to do. I'm going to move out all deadlines on your
7 scheduling order by 60 days, with the understanding that if
8 for the next, well, until the middle of June when you know
9 if this program is starting, anyway, whatever makes sense,
10 whether it's 30 days or until June 15, you can discuss that
11 between you, for some period of time you're going to hold
12 off on incurring costs. And then, at the end of that point
13 in time, maybe by June -- why don't I just say by June
14 19 -- by June 19, which is the end of that week that starts
15 June 15 -- by June 19, send me a status report, which is
16 either things are going great, we want to stay this longer
17 because we really are participating in this program; or
18 things look grim, it's taken a downturn in the Virgin
19 Islands, and we want to get back on the calendar and we've
20 started talking about that; and because of some logistical
21 issues, we think we need more time or we think we're okay
22 or whatever. But 60 days on the dates, with an
23 understanding that you're going to pause things
24 cooperatively and give me a status report by June 19.
25 Rational?

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2 MS. WANG: Yes, your Honor. Thank you.

3 THE COURT: Defendants' side?

4 MR. MOSKOWITZ: That is acceptable to us. Bennet
5 Moskowitz. Thank you.

6 THE COURT: Okay. I will issue an order, probably
7 just a text order on the docket, that will confirm that for
8 you. I will look at the schedule we have and put firm
9 dates on that are 60 days out so you have definite dates
10 for various and assorted things. If some dates have
11 already gone by, don't worry about it because they'll have
12 kicked out 60, you know, retroactively. And I am assuming
13 that neither of you is going to start jumping up and down,
14 saying this week we must now have depositions happening. I
15 assume that you're going to wait until approximately
16 June 15 to see if it's really necessary and report by
17 June 19.

18 MR. MOSKOWITZ: Bennet Moskowitz here. We have,
19 yes, no intention of that, your Honor, and I just --

20 THE COURT: I'm sure.

21 MR. MOSKOWITZ: Yes. Not what I want.

22 THE COURT: I'm sure. I'm sure. Look, my
23 intention is to balance things. You know, if there's a
24 realistic chance of it getting settled, any of these cases
25 getting settled, that's great. And I don't want you

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2 spending unnecessary funds. But if there are problems with
3 it, I want to keep discovery moving in a rational way,
4 keeping costs reasonably under control, keep you talking,
5 keep you planning. That was the concept all along. And so
6 that's the balancing act. Okay?

7 MS. WANG: Understood. Thank you, your Honor.

8 THE COURT: Okay. And I --

9 MR. MOSKOWITZ: Thank you, your Honor.

10 THE COURT: -- realize different cases may be
11 handled somewhat differently with different counsel, and so
12 be it. I was thinking I'd try to get you all more or less
13 on the same track, but there are always going to be some
14 divergences.

15 Okay. Thank you, all.

16 MS. WANG: Thank you.

17 THE COURT: I will talk to at least certain of you
18 again in half an hour.

19 MR. MOSKOWITZ: Thank you.

20 THE COURT: All right. Take care, everybody. Be
21 well.

22 (Whereupon, the matter is recessed.)

23

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3 C E R T I F I C A T E
4

5 I, Carole Ludwig, certify that the foregoing
6 transcript of proceedings in the case of Davies v. Indyke
7 et al, Docket #19-cv-10788-GHW-DCF, was prepared using
8 digital transcription software and is a true and accurate
9 record of the proceedings.

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13 Signature Carole Ludwig

14 Carole Ludwig

15 Date: May 29, 2020

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