

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1000,

*Plaintiff,*

v.

DARREN K. INDYKE and RICHARD D. KAHN, in  
their capacities as the executors of the ESTATE OF  
JEFFREY E. EPSTEIN,

*Defendants.*

Case No. 1:19-cv-10577-LJL-DCF

**NOTICE OF DEFENDANTS' MOTION TO DISMISS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all prior pleadings and proceedings in this action, Defendants will move this Court before the Hon. Lewis J. Liman, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007, at a time to be scheduled by this Court, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Plaintiff Jane Doe 1000's Complaint and claims for punitive damages with prejudice (ECF No. 1); and for such other and further relief as may be just and proper.

Dated: New York, New York  
February 28, 2020

By: /s/ Bennet J. Moskowitz  
Bennet J. Moskowitz  
TROUTMAN SANDERS LLP  
875 Third Avenue  
New York, New York 10022

*Attorneys for Defendants*