



January 10, 2020

**VIA ECF**

The Honorable Debra Freeman  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Juliette Bryant v. Darren K. Indyke and Richard D. Kahn, in their capacities as executors of the Estate of Jeffrey Edward Epstein, 19-10479*  
*Jane Doe 1000 v. Darren K. Indyke and Richard D. Kahn, in their capacities as executors of the Estate of Jeffrey Edward Epstein, 19-10577*  
*Annie Farmer v. Darren K. Indyke and Richard D. Kahn, in their capacities as executors of the Estate of Jeffrey Edward Epstein, and Ghislaine Maxwell, 19-10475*  
*Teresa Helm v. Darren K. Indyke and Richard D. Kahn, in their capacities as executors of the Estate of Jeffrey Edward Epstein, 19-10476*

Dear Judge Freeman:

Pursuant to the Court's request at the November 21, 2019, Case Management Conference, Plaintiffs and Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein, jointly submit this letter to provide the Court with an update as to the progress of discussions regarding both discovery and settlement.

The parties have thus far engaged in two productive conferences pursuant to Rule 26(f) of the Federal Rules of Civil Procedure. During those conferences, the parties agreed to exchange initial disclosures by January 23, 2020, and to exchange discovery plans one week thereafter, on January 30, 2020.

As the Court is aware, Defendants have arranged for a Victims' Compensation Program that will be available to Plaintiffs. Plaintiffs' counsel has conferred with the Program's designers and administrators, the Program's administrators provided Plaintiffs with a proposed protocol for the Program, and Plaintiffs have provided some feedback to the administrators. The motion for the Superior Court of the United States Virgin Islands to approve the establishment of the Program will be heard on February 4, 2020.

The parties request a conference with the Court on February 6 or 7, 2020, to resolve any potential disagreements as to how these matters should proceed. The parties will provide the Court with their proposed discovery plan(s) 48 hours before any such conference.

**BSF**

Respectfully submitted,

/s/ Joshua I. Schiller

David Boies, Esq.  
Joshua I. Schiller, Esq.  
Sigrid S. McCawley, Esq.  
Boies Schiller Flexner LLP

/s/ Bennet J. Moskowitz

Bennet J. Moskowitz, Esq.  
Troutman Sanders LLP

cc: Counsel of Record (via ECF)

---