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January 10, 2020

ECF

Hon. Debra C. Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *Jane Doe 15*, 1:19-cv-10653-PAE-DCF; *Mary Doe*, 1:19-cv-10758-PAE-DCF; *Teala Davies*, 1:19-cv-10788-GHW-DCF

Dear Judge Freeman:

We represent Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, "Defendants"; and Defendants together with Plaintiffs Jane Doe 15, Mary Doe, and Teala Davies, the "Parties") in the referenced actions. Pursuant to the Court's direction at the initial conference, we write on behalf of all Parties to report to the Court regarding status on these actions.

First, with respect to the Epstein Victims' Compensation Program (the "Program"), Plaintiffs' counsel in these actions have reviewed the Program's protocol and begun to propose substantive changes to it and to confer with the Program's designers and administrator, and are considering whether their clients will participate.

Second, with respect to the litigation of these three actions, the Parties conducted their Rule 26(f) conference by telephone yesterday, and are proceeding to finalize stipulations with respect to anonymity (to the extent that is relevant, for two of the three actions) and a Protective Order; the Parties further agree to exchange initial disclosures by January 23, 2020, proposed discovery schedules by January 30th, and then to propose a jointly agreed upon (or, absent an agreement, our alternate proposals) to Your Honor by February 6, 2020.

Respectfully submitted,

s/Bennet J. Moskowitz
Bennet J. Moskowitz