

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

DARREN K. INDYKE and RICHARD D. KAHN,
in their capacities as the executors of the
ESTATE OF JEFFREY EDWARD EPSTEIN and
GHISLAINE MAXWELL, an individual,

Defendants.

Case No. 1:20-cv-00484 (JGK) (DCF)

**JOINT STIPULATION FOR ORDER ON
PLAINTIFF'S MOTION TO PROCEED BY PSEUDONYM**

Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, the “Co-Executors”), jointly with Plaintiff Jane Doe (“Plaintiff”), through counsel for the Co-Executors, respectfully submit this stipulation (the “Stipulation”) together with the attached Proposed Order on Plaintiff’s Motion For Leave to Proceed By Pseudonym (the “Proposed Order”) and accompanying Non-Disclosure Agreement (the “NDA”).

The parties respectfully request the Court enter the Proposed Order and NDA to resolve Plaintiff’s Motion For Leave to Proceed By Pseudonym (ECF #5).

Dated: March 30, 2020
New York, New York

Respectfully submitted,

TROUTMAN SANDERS LLP

By: /s/ Bennet J. Moskowitz

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By: /s/ Robert S. Glassman [with permission]

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ORDER ON PLAINTIFF'S ANONYMITY

IT IS HEREBY ORDERED that any person subject to this Order, including the parties to this action and their respective counsel of record, shall adhere to the following terms:

1. Within three (3) days of entry of this Order, Counsel of Record for Plaintiff shall disclose Plaintiff's identity to Counsel of Record for the Co-Executors, in writing.
2. Counsel of Record for the Co-Executors may disclose Plaintiff's identity only to the Co-Executors and any attorneys, paralegals, and clerical or other assistants working with or for the Co-Executors on matters related to this action; and the recipients of such information shall not disclose it to any other persons.
3. If the Co-Executors wish to disclose Plaintiff's identity to any person not otherwise permitted to receive such information under this Order, the Co-Executors are limited to doing so in connection with defending this action, and must require such person to first execute a non-disclosure agreement, in a form agreed to by the parties, that prevents such person from disclosing Plaintiff's identity to any other persons. The Co-Executors must maintain a list of all such persons to whom Plaintiff's identity is disclosed and copies of the executed non-disclosure agreements, all of which are subject to *in camera* inspection.
4. All portions of pleadings, motions or other papers filed with the Court that disclose Plaintiff's identity shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. The parties shall use their best efforts to minimize such sealing. Any party filing a motion or any other papers with the Court under seal shall also publicly file a redacted copy of the same, via the Court's Electronic Case Filing system, that redacts the Plaintiff's identity and text that would reveal Plaintiff's identity.

5. The parties may seek to modify or amend this Order at any time upon motion to the Court or by stipulation.

SO ORDERED.

Date: _____
New York, New York

Hon. Debra C. Freeman
United States Magistrate Judge
Southern District of New York

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NON-DISCLOSURE AGREEMENT

I, _____, acknowledge that I understand that the identity of the Plaintiff in this action is confidential. I agree that: (1) I will hold in confidence Plaintiff's identity; (2) I will use Plaintiff's identity only in connection with this litigation; and (3) I will take all due precautions to prevent the unauthorized or inadvertent disclosure of Plaintiff's identity.

By acknowledging these obligations under this Non-Disclosure Agreement, I understand that I am submitting myself to the jurisdiction of the United States District Court for the Southern District of New York for the purpose of any issue or dispute arising hereunder, and that my willful violation of any term of the Non-Disclosure Agreement could subject me to punishment for contempt of court.

Dated:

[Signature]