



August 12, 2020

VIA ECF

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

**Re: *Doe v. Indyke, et al.*, 1:20-cv-000484-JGK-DCF
Status Update Following 8/5/20 Scheduling Conference**

Dear Judge Freeman:

We are writing on behalf of our client, plaintiff Jane Doe, in the above-referenced litigation and to update the Court on some discovery issues in our case following the August 5, 2020 scheduling conference.

First, on August 5, 2020, this Court ordered defendant Ghislaine Maxwell to serve her initial disclosures no later than August 10, 2020. The Court's specific order was that: "*It is hereby ORDERED that: 1. Defendant Ghislaine Maxwell ("Maxwell") shall serve her initial disclosures no later than August 10, 2020.*" As of the time of submitting this letter, however, Ms. Maxwell has not served her initial disclosures on the parties. Moreover, Ms. Maxwell has not sought any relief from the Court to excuse her of complying with the order of the Court. Accordingly, as it stands, Ms. Maxwell has violated the Court's order.

Second, it has now been over 4 months since Plaintiff served the Epstein Estate with document requests and she has still failed to receive a single substantive response nor a single page of evidence from the Epstein Estate to date. Indeed, even after providing counsel for the Epstein Estate with her proposed edits to their draft confidentiality order and non-disclosure agreement they have insisted all Epstein victims sign before producing any information to them, Plaintiff received no response and no documents have been released.

And third, despite Plaintiff's multiple attempts at getting available deposition dates for defendant Richard Kahn, the co-executor of the Epstein Estate, his attorneys simply just refuse to provide them. Instead, they are insisting that Plaintiff's counsel first tell them what Mr. Kahn is to be questioned about and essentially prove why he—a defendant in this action—ought to be required to testify at deposition.

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It has become incredibly obvious that there is a concerted and coordinated effort by the Epstein Estate and its attorneys to not only deprive the victims of information in these cases that they are entitled to by law but also deny them of having their day in court. Indeed, the Epstein Estate repeatedly reminds Plaintiff how she is the only victim who continues to pursue her case against them while the other victims have all agreed to stay their cases in hopes of resolving them through the victim compensation fund. And despite the Epstein Estate's ongoing self-serving statements that they have not formally requested a stay as to any of the proceedings themselves, that is form over substance. To the contrary, they have done everything they can to make these cases as difficult as possible for the victims so the victims feel like they have no real choice but to submit to the fund and postpone the proceedings indefinitely. As a consequence, in this case, the Epstein Estate has resorted to belittling Plaintiff and threatening her lawyers with sanctions and accusations of impropriety simply because she is exercising her constitutional right to pursue a legal claim against those responsible for causing her unimaginable harm. In short, since Plaintiff has not agreed to stay her case and walk away, she is being punished by the Epstein Estate for doing what she has a basic right to do. That is simply unacceptable and Plaintiff is not walking away.

Respectfully submitted,

PANISH SHEA & BOYLE

/s/ Robert Glassman

Robert Glassman