

**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 E. EPSTEIN,

Defendants.

Case No. 1:19-cv-08673-KPF-DCF

JOINT STIPULATION AND [PROPOSED] ORDER STAYING ACTION

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that:

1. The captioned action is hereby stayed pending Plaintiff's participation in the Epstein Victims' Compensation Program (the "Program").
2. Should the Plaintiff cease her participation in the Program for any reason (including but not limited to by declining any monetary settlement offered by the Program), the stay will be lifted within one week (seven calendar days) after Plaintiff provides Defendants with written notice of her intent not to participate in the Program.
3. After the lifting of the stay, if any, the Parties will confer on a schedule for the remaining discovery in this action.

Dated: July 29, 2020
New York, New York

Respectfully submitted,
TROUTMAN PEPPER HAMILTON
SANDERS LLP

By: /s/ **Bennet J. Moskowitz**

Bennet J. Moskowitz
875 Third Avenue
New York, NY
212.704.6000
Bennet.moskowitz@troutman.com

Attorneys for Darren K. Indyke and D. Richard Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein

KAPLAN HECKER & FINK, LLP

By: /s/ **Roberta A. Kaplan**

Roberta A. Kaplan
Julie E. Fink
Kate L. Doniger
Alexandra K. Conlon
350 Fifth Avenue, Suite 7110
New York, NY 10118
212.763.0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
kdoniger@kaplanhecker.com
aconlon@kaplanhecker.com

Attorneys for Plaintiff

Date: _____, 2020
New York, New York

HON. DEBRA C. FREEMAN
United States Magistrate Judge