



EDWARDS
POTTINGER LLC

Florida Office

Bradley J. Edwards *†
Seth M. Lehrman *†
Brittany N. Henderson *◇
Matthew D. Weissing *†

425 North Andrews Avenue
Suite 2
Fort Lauderdale, FL 33301

Telephone (954)524-2820
Fax (954)524-2822

New York Office

J. Stanley Pottinger ‡

† Admitted in California
◇ Admitted in District of Columbia
* Admitted in Florida
‡ Admitted in New York
‡ Board Certified Civil Trial Lawyer

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FILED VIA ECF

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

Re: VE v. Nine East 71st Street et al., No. 19-cv-07625 (S.D.N.Y.) (Nathan, J.)
Katlyn Doe v. Darren K. Indyke et al., No. 19-cv-07771 (S.D.N.Y.) (Castel, J.)
Pricilla Doe v. Darren K. Indyke et al., No. 19-cv-07772 (S.D.N.Y.) (Carter, J.)
Lisa Doe v. Darren K. Indyke et al., No. 19-cv-07773 (S.D.N.Y.) (Ramos, J.)
Anastasia Doe v. Darren K. Indyke, et al., No. 19-cv-11869 (S.D.N.Y.) (Nathan, J.)

Dear Judge Freeman:

We represent the five Plaintiffs referenced above whose cases have all been assigned to Your Honor. While we agree with Defendants' assertion that our discussions with the designers and administrator of the Epstein Victims' Compensation Program have been positive and productive, in our view, it remains important to every aspect of the process that our cases are not stayed and that they proceed accordingly.

As we explained during the Case Management Conference that was held on November 21, 2019, our clients have varying views of the process, and while each will maintain an open mind about potential alternative resolution, those who have filed lawsuits do not wish to delay the expeditious litigation of their claims.

We have and will continue to work with Mr. Moskowitz to ensure that we arrive at as many agreements as possible. Consequently, we agree with the following discovery schedule as proposed in his report: Plaintiffs and the Estate will make initial disclosures by January 23, 2020; the Parties will exchange proposed discovery plans by January 30, 2020; and the Parties will jointly submit to Your Honor a proposed discovery plan by February 6, 2020.

Respectfully Submitted,

Bradley J. Edwards

425 North Andrews Avenue, Suite 2, Fort Lauderdale, Florida 33301
954.524.2820 office 954.524.2822 fax