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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: VE, 1:19-cv-07625-AJN-DCF; Katlyn Doe, 1:19-cv-07771-PKC-DCF; Priscilla Doe, 1:19-cv-07772-ALC-DCF; Lisa Doe, 1:19-cv-07773-ER-DCF; Anastasia Doe, 1:19-cv-11869-AJN-DCF

Dear Judge Freeman:

We represent Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (the “Estate”), Nine East 71st Street, Corporation, Financial Trust Company, Inc., NES, LLC, Florida Science Foundation, Inc., HBRK Associates, Inc., JEGE, Inc., Maple, Inc., and LSJ, LLC (together, “Defendants”; and Defendants together with Plaintiffs VE, Katlyn Doe, Priscilla Doe, Lisa Doe and Anastasia Doe, the “Parties”) in the referenced actions, as applicable. We write on behalf of all Parties to report to the Court regarding settlement and to respectfully request that the Court approve the Parties’ discovery proposal.

We understand that the vast majority of the plaintiffs in the above referenced and other actions against the Estate pending in this District will or are very likely to participate in the Epstein Victims’ Compensation Program (the “Program”), with five plaintiffs having already voluntarily stayed their actions pending their participation in the Program. Counsel for all such plaintiffs have conferred extensively with the Program designers and administrator, including in person, to, among other things, provide specific input on the draft Program protocol issued on December 13, 2019. We understand such discussions have been positive and productive.

The Parties propose the following schedule for discovery: 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.

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Respectfully submitted,

s/Bennet J. Moskowitz
Bennet J. Moskowitz