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April 15, 2020

Via ECF

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

**Re: Jane Doe 1000, 1:19-cv-10577-LJL-DCF; Teresa Helm, 1:19-cv-10476-PGG-DCF;
Juliette Bryant, 1:19-cv-10479-ALC-DCF**

Dear Judge Freeman:

We represent Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, the “Co-Executors”), in the above-referenced actions commenced by Jane Doe 1000, Teresa Helm and Juliette Bryant (together, “Plaintiffs”, and with the Co-Executors, the “Parties”). In light of the ongoing pandemic and the various difficulties it has presented for all parties, we write with the consent of Plaintiffs to request that the Court extend the remaining deadlines in the above-referenced actions, as set by this Court’s Order dated February 11, 2020, by thirty (30) days, as follows:

- the deadline for Plaintiffs to file any motions to amend the pleadings or to join any additional parties be extended from April 30, 2020 to June 1, 2020;
- the deadline for the Parties to submit joint status reports to the Court, regarding discovery and the progress of settlement discussions, be extended from April 30, 2020 to June 1, 2020;
- the deadline for the completion of fact discovery be extended from June 10, 2020 to July 10, 2020;
- the deadline for service of Plaintiffs’ expert reports be extended from June 10, 2020 to July 10, 2020;
- the deadline for service of the Defendants’ rebuttal reports be extended from July 10, 2020 to August 10, 2020; and

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- the deadline for the completion of expert discovery be extended from July 31, 2020 to August 31, 2020.

This is the first request for an extension of these deadlines.

Respectfully submitted,

s/Bennet J. Moskowitz
Bennet J. Moskowitz

cc: Counsel of Record (via ECF)