

**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. 19 Civ. 8673 (KPF) (DCF)

DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member of the Bar of the State of New York, and I am admitted to appear before this Court. I am a partner with the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff Jane Doe in the above-captioned action. I respectfully submit this Declaration in support of Plaintiffs' Opposition to Defendants' Motion to Dismiss. Unless stated otherwise, the facts stated herein are of my own personal knowledge, and if called as a witness I could competently testify thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Complaint filed in, *Government of the United States Virgin Islands v. Estate of Jeffrey E. Epstein, et al.*, ST-20-CV-14.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Last Will and Testament of Jeffrey E. Epstein.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 14, 2020
New York, New York

/s/ Roberta A. Kaplan
Roberta A. Kaplan