

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|   |   |                          |
|---|---|--------------------------|
| -----   | X |                          |
| JANE DOE,                                     | : |                          |
|   | : |                          |
| Plaintiff,                                    | : |                          |
|   | : | 19 Civ. 8673 (KPF) (DCF) |
|   | : |                          |
| v.  | : |                          |
|   | : |                          |
| DARREN K. INDYKE and RICHARD D.               | : |                          |
| KAHN, in their capacities as the executors of | : |                          |
| the Estate of Jeffrey E. Epstein,             | : |                          |
|   | : |                          |
| Defendants.                                   | : |                          |
| -----   | X |                          |

**NOTICE OF DEFENDANTS' MOTION TO DISMISS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all prior pleadings and proceedings in this action, Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein, will move this Court before the Hon. Katherine Polk Failla, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, at a time and place to be scheduled by this Court, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice Plaintiff Jane Doe's claim for punitive damages in her Complaint (ECF No. 1); and for such other and further relief as may be just and proper.

Dated: New York, New York  
January 15, 2020

Respectfully submitted,

TROUTMAN SANDERS LLP  
875 Third Avenue  
New York, New York 10022

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

*Attorney for Defendants Darren K. Indyke and  
Richard D. Kahn, Co-Executors of the Estate of  
Jeffrey E. Epstein*