

**From:** Roberta Kaplan <[REDACTED]>  
**To:** "[REDACTED]" <[REDACTED]>  
**Cc:** "Kate L. Doniger" <[REDACTED]>, Alex Conlon <[REDACTED]>  
**Subject:** Fwd: Epstein Victims' Compensation Program  
**Date:** Sat, 14 Dec 2019 14:55:17 +0000

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Roberta ("Robbie") Kaplan, Esq.  
Kaplan Hecker & Fink LLP  
350 Fifth Avenue | Suite 7110  
New York, New York 10118  
[REDACTED] | [REDACTED]

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**From:** Jordy Feldman <[REDACTED]>  
**Sent:** Saturday, December 14, 2019 9:46:10 AM  
**To:** Kate L. Doniger <[REDACTED]>; Roberta Kaplan <[REDACTED]>; Julie Fink <[REDACTED]>; Alex Conlon <[REDACTED]>; Rachel Harris <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** Re: Epstein Victims' Compensation Program

Roberta and Kate,

Ken, Camille and I have spent many years designing and running these types of claims resolution programs. Our reputations rest on our credibility and independence, as demonstrated in those other programs, and we bring the same independence and fair-mindedness to this Program. There is no need for an additional administrator. This Program will be non-adversarial and will treat the victims with the dignity they deserve. We hope that you will meet with us and share your feedback on the Draft Protocol. And, once the Program is up and running, we hope you will participate and see the process for yourself.

Jordy

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**From:** Kate L. Doniger <[REDACTED]>  
**Sent:** Friday, December 13, 2019 5:17 PM  
**To:** Jordy Feldman <[REDACTED]>; Roberta Kaplan <[REDACTED]>; Julie Fink <[REDACTED]>; Alex Conlon <[REDACTED]>; Rachel Harris <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: Epstein Victims' Compensation Program

Jordy, Ken, and Camille

We have received the protocol and will get back to you. In the meantime, we would appreciate your response to our proposal regarding the addition of an administrator selected by plaintiffs. Thank you,

**Kate L. Doniger | Kaplan Hecker & Fink LLP**  
350 Fifth Avenue | Suite 7110

EFTA00019565

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**From:** Jordy Feldman <[REDACTED]>  
**Sent:** Friday, December 13, 2019 2:00 PM  
**To:** Roberta Kaplan <[REDACTED]>; Kate L. Doniger <[REDACTED]>; Julie Fink <[REDACTED]>; Alex Conlon <[REDACTED]>; Rachel Harris <[REDACTED]>  
**Cc:** [REDACTED]; [REDACTED]  
**Subject:** Re: Epstein Victims' Compensation Program

Roberta,

I wanted to let you know that Ken, Camille and I have prepared a Draft Protocol for the Program, setting forth the proposed criteria and requirements for the evaluation of claims, and the claims process. As you know, the establishment of the Program is still pending approval by the Superior Court of the U.S. Virgin Islands. However, we felt that it was important for us to move forward on the proposed design of the Program and to engage you in the process as soon as possible.

To that end, we have attached a copy of the Draft Protocol, for your review and consideration. We welcome an opportunity to meet with you to discuss any comments you may have. The comment period will run through January 31, 2020.

Whenever you have a chance, please let us know if you are available to meet on any of the following dates: December 18, January 6, 7, 8, 10, and 16. If none of those dates work, please provide alternate dates and times, and we will try to coordinate schedules and set something up.

Looking forward to hearing your thoughts.

Regards,  
Jordy, Ken and Camille

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**From:** Kate L. Doniger <[REDACTED]>  
**Sent:** Monday, December 9, 2019 4:46 PM  
**To:** Jordy Feldman <[REDACTED]>  
**Cc:** Roberta Kaplan <[REDACTED]>; Julie Fink <[REDACTED]>; Alex Conlon <[REDACTED]>; Rachel Harris <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: Epstein Victims' Compensation Program

**On behalf of Roberta Kaplan**

Jordy,  
Thank you for your email. We appreciate your commitment to a program that is independent of the Estate, which we also view as a central feature of any viable alternative to litigation. As I'm sure you can understand, however, a claims resolution program in which the three decision-makers were selected and hired by the Estate—and, we presume, are being paid by the Estate—cannot be said to be independent. In our view, there is a straightforward solution to this otherwise intractable problem: the program should add a fourth administrator, selected by plaintiffs, and require that all claims decisions are rendered unanimously.

We look forward to discussing this proposal with you. We suggest arranging a time to do so before the protocol is finalized, since it will be important to incorporate the input of an additional administrator into that process. We will, of course, also raise this with the Estate.

**Roberta ("Robbie") Kaplan, Esq.**

Kaplan Hecker & Fink LLP  
350 Fifth Avenue | Suite 7110  
New York, New York 10118

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**From:** Jordy Feldman <[REDACTED]>

**Sent:** Wednesday, December 4, 2019 7:24 PM

**To:** Kate L. Doniger <[REDACTED]>; Roberta Kaplan <[REDACTED]>

**Cc:** Julie Fink <[REDACTED]>; Alex Conlon <[REDACTED]>; Mariann Wang <[REDACTED]>;

Arick Fudali <[REDACTED]>; Daniel Mullkoff <[REDACTED]>; Brad Edwards <[REDACTED]>;

Lisa Bloom <[REDACTED]>; Brittany Henderson <[REDACTED]>; ECF <[ecf@epllc.com](mailto:ecf@epllc.com)>; Laura Starr <[REDACTED]>;

Andrew Buzin <[REDACTED]>; Gloria Allred <[REDACTED]>; Colleen Mullen <[REDACTED]>; [REDACTED]

**Subject:** RE: Epstein Victims' Compensation Program

Roberta,

Thank you for your email. I hear your concerns and want to reiterate that this proposed Program is entirely voluntary and independent of the Estate. It in no way imposes a process or outcome on the victims, and will in no way be administered or controlled by the Estate. Those are signature features of the Program.

As I mentioned in my email last week, Ken, Camille and I are in the process of drafting a claims protocol and plan to circulate it - in draft form - to you and your counterparts before the holidays, and welcome any input you may have at that time. We will provide ample time for you to review and respond to the draft protocol, and will be happy and available to discuss your comments before the protocol is finalized.

We look forward to speaking with you.

Regards,

Jordy

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**From:** Kate L. Doniger <[REDACTED]>

**Sent:** Monday, December 2, 2019 9:05 PM

**To:** Jordy Feldman <[REDACTED]>

**Cc:** Roberta Kaplan <[REDACTED]>; Julie Fink <[REDACTED]>; Alex Conlon <[REDACTED]>;

Mariann Wang <[REDACTED]>; Arick Fudali <[REDACTED]>; Daniel Mullkoff <[REDACTED]>; Brad Edwards <[REDACTED]>;

Lisa Bloom <[REDACTED]>; Brittany Henderson <[REDACTED]>; ECF <[ecf@epllc.com](mailto:ecf@epllc.com)>; Laura Starr <[REDACTED]>;

Andrew Buzin <[REDACTED]>; Gloria Allred <[REDACTED]>; Colleen Mullen <[REDACTED]>; [REDACTED]

**Subject:** RE: Epstein Victims' Compensation Program

**On behalf of Roberta Kaplan**

Jordy,

EFTA00019567

Thank you for reaching out to us. We are writing back on behalf of (and copying) certain plaintiffs' counsel who appeared at an SDNY conference last week for sexual abuse survivors of Epstein. We intend no disrespect to you and your colleagues, but, candidly, we have serious concerns about the Estate's purported decision to impose a non-binding settlement process on our clients unilaterally. All of these women still struggle today because of the profound manipulation, objectification, and physical abuse to which Jeffrey Epstein subjected each of them. Regardless of your own significant experience and good intentions, the fact that the Estate chose an administrator without any participation, input, or consideration of our clients' views or wishes is disconcerting, particularly given the personal nature of the claims at issue.

We are, of course, interested above all in advancing our clients' interests. As you may know, at a status conference last week in the Southern District, Magistrate Judge Freeman instructed counsel for the Estate and counsel for plaintiffs to engage in good faith discussions about any proposed claim resolution program. We have already directed a request for information on the proposed program to Bennet Moskowitz, and look forward to his response and to a productive dialogue with counsel ahead of the Jan. 10, 2019 deadline set by the Magistrate for an update on the status of our negotiations. Assuming that our settlement discussions with Defendants progress, we look forward to working with you at the appropriate time to design an effective and appropriate settlement program.

**Roberta ("Robbie") Kaplan, Esq.**

Kaplan Hecker & Fink LLP  
350 Fifth Avenue | Suite 7110  
New York, New York 10118

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**From:** Jordy Feldman <[REDACTED]>  
**Sent:** Monday, November 25, 2019 4:00 PM  
**To:** Roberta Kaplan <[REDACTED]>  
**Cc:** [REDACTED]; [REDACTED]  
**Subject:** Epstein Victims' Compensation Program

Roberta,

As you know, I will be serving as co-Designer, along with Ken Feinberg and Camille Biros, and Administrator of the proposed Epstein Victims' Compensation Program. I wanted to reach out to you to introduce myself, as I understand that you represent victims who have asserted, or may assert, claims of sexual abuse against Jeffrey Epstein or his Estate. I also wanted to reinforce the key guiding principles of the Program and give you a sense of timing in the near term.

This proposed Program is purely voluntary, non-adversarial and entirely independent of the Estate. The Estate will have no authority whatsoever to interfere with the administration of the Program or the evaluation of individual claims.

Ken, Camille and I are in the process of drafting a proposed protocol - setting forth the proposed terms, conditions, and criteria that will govern the Program - and plan to circulate a draft protocol before the end of the year. We will be seeking your input at that time in whatever format you would like to provide it, through a meeting with us and/or written comments, before the protocol is finalized.

We look forward to serving these deserving victims.

Regards,

EFTA00019568

Jordy

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