

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

DARREN K INDYKE and RICHARD D. KAHN, in
their capacities as executors of THE ESTATE OF
JEFFERY E. EPSTEIN,

Defendants.

Case No. 1:20-cv-02365-LJL-DCF

**NOTICE OF CO-EXECUTORS' MOTION
TO DISMISS PLAINTIFF'S COMPLAINT**

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, as Co-Executors of the Estate of Jeffrey E. Epstein, will move this Court before the Hon. Lewis J. Liman, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a time 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 Complaint (ECF Doc. 1); and for such other and further relief as may be just and proper.

Dated: New York, New York
September 6, 2021

Respectfully submitted,

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

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

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