

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARIA FARMER,

*Plaintiff,*

v.

DARREN K. INDYKE and RICHARD D. KAHN  
in their capacities as the executors of the ESTATE  
OF JEFFREY EDWARD EPSTEIN,

*Defendants.*

Case No. 1:19-cv-10474-NRB

**JOINT STIPULATION AND [PROPOSED] ORDER STAYING ACTION**

WHEREAS independent claims administration experts are designing and implementing the Epstein Victims' Compensation Program (the "Program") to resolve sexual abuse claims against decedent Jeffrey E. Epstein ("Decedent") in a non-adversarial alternative to litigation; and

WHEREAS Plaintiff Maria Farmer ("Plaintiff," and together with Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein, the "Parties") seeks to participate in the Program; and

WHEREAS the Parties seek to preserve their resources and judicial economy by staying this action unless and until (1) Plaintiff ceases her participation in the Program or (2) Plaintiff's participation in the Program is no longer a possibility; and

WHEREAS should Plaintiff resolve her claims against Decedent via the Program, the Parties will thereafter promptly discontinue this action with prejudice.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that:

1. The captioned action is hereby stayed pending further Order of the Court.

2. After the lifting of the stay, if any, Defendants may file their motion to dismiss Plaintiff's Amended Complaint without the need for a pre-motion conference, as set forth in the Court's April 2, 2020 Order (ECF No. 27); and the Parties will confer on a briefing schedule for Defendants' motion in which no more than sixty (60) days elapse from the filing of Defendants' motion to the filing of Defendants' reply.

Dated: April 9, 2020  
New York, New York

Respectfully submitted,  
BOIES SCHILLER FLEXNER LLP

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*Attorneys for Defendants*

Date: April \_\_, 2020  
New York, New York

HON. NAOMI REICE BUCHWALD  
United States District Judge