

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

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JANE DOE 17,

Plaintiff,

v.

DARREN K. INDYKE AND  
RICHARD D. KAHN, AS JOINT  
PERSONAL REPRESENTATIVES OF  
THE ESTATE OF JEFFREY E. EPSTEIN,  
NINE EAST 71st STREET CORPORATION,  
LAUREL, INC., FINANCIAL TRUST  
COMPANY, INC., NES, LLC, MAPLE, INC.,  
LSJE, LLC, HBRK ASSOCIATES, INC.,  
NAUTILUS, INC., CYPRESS, INC. and JEGE,  
INC.,

Defendants.  
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Case No. 1:19-cv-09610-PAE-DCF

**NOTICE OF DEFENDANTS' MOTION  
TO DISMISS PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Bennet J. Moskowitz dated December 23, 2019 and the exhibit thereto, 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, Nine East 71st Street, Corporation, Financial Trust Company, Inc., NES, LLC, Laurel, Inc., Maple, Inc., LSJE, LLC, HBRK Associates, Inc., Nautilus, Inc., Cypress, Inc., and JEGE, Inc. will move this Court before the Hon. Paul E. Engelmayer, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on January 17, 2019 at 10:00 a.m., or as soon thereafter as counsel may be heard, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Plaintiff Jane Doe 17's Complaint (Doc. # 1) in its entirety with

prejudice for failure to state a claim; and for such other and further relief as may be just and proper.

Dated: New York, New York  
December 23, 2019

Respectfully submitted,

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

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

*Attorneys for Defendants*