

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

-----X
JANE DOE,

Plaintiff,

Docket No. 20-CV-02365

-against-

DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as executors of the ESTATE OF JEFFREY E. EPSTEIN; NES, LLC; NINE EAST 71ST STREET CORPORATION; FINANCIAL TRUST COMPANY, INC.; NEW YORK STRATEGY GROUP, LLC; DARREN K. INDYKE, in his capacity as trustee of EPSTEIN INTERESTS; DARREN K. INDYKE, in his capacity as a representative of J. EPSTEIN VI FOUNDATION; J. EPSTEIN VIRGIN ISLANDS FOUNDATION, INC.; C.O.U.Q. FOUNDATION, INC.; GRATITUDE AMERICA LTD.; DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as trustees of THE 1953 TRUST; SOUTHERN TRUST COMPANY, INC.; MAPLE, INC.; CYPRESS, INC.; LAUREL, INC.; SCI JEP; POPULAR, INC.; NAUTILUS, INC.; HBRK ASSOCIATES, INC.; JEJE, LLC; JEJE, INC.; PLAN D, LLC; HYPERION AIR, LLC; FREEDOM AIR INTERNATIONAL, INC.; ZORRO DEVELOPMENT CORP.; LSJE, LLC; L.S.J., LLC; ZORRO MANAGEMENT, LLC,

Defendants.
-----X

**NOTICE OF MOTION
TO PROCEED
ANONYMOUSLY**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, and all prior pleadings and proceeding herein, Jane Doe (“Plaintiff”) will move this Court, before the Honorable Debra C. Freeman, U.S.D.J., at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order, pursuant to Rule 10(a) of the Federal Rules of Civil

Procedure, for leave to proceed anonymously and for such other and further relief as the Court deems appropriate.

Dated: New York, New York
July 30, 2021

KAISER SAURBORN & MAIR, P.C.



By: _____
Daniel J. Kaiser[DK-9387]
30 Broad Street, 37th Floor
New York, New York 10004
(212) 338-9100

To: TROUTMAN PEPPER
Bennet J. Moskowitz, Esq.
875 Third Avenue
New York, New York 10022
(212) 704-6000