BOIES SCHILLER FLEXNER

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May 14, 2020

VIA ECF

The Honorable Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Jane Doe 1000 v. Darren K. Indyke & Richard D. Kahn*, 19-10577-LJL-DCF

Dear Judge Freeman:

We submit on behalf of Plaintiff Jane Doe 1000 this reply in further support of her letter motion for a conference to address Defendants' failure to comply with their discovery obligations (ECF No. 46), and in response to Defendants' second letter in opposition, filed on May 13, 2020 (ECF No. 52). As an initial matter, the Court should disregard Defendants' latest response as untimely. Pursuant to Individual Rule 1.D., "[u]nless the Court orders otherwise, opposition to any letter motion shall be filed within three (3) days of the moving letter." Notwithstanding this rule, Defendants filed an incomplete and non-substantive opposition on May 8, and requested "permission to submit a response to the substantive issues raised in the Letters by May 13, 2020." ECF No. 47. Defendants' letter did not comply with Individual Rule 1.B., which governs "requests for adjournments or extensions of time." In any event, the Court did not issue an order extending Defendants' time to respond, much less grant Defendants leave to file two oppositions as opposed to one. But even if the Court were to consider Defendants' untimely filing, each of their arguments is meritless, and confirms the need for immediate Court intervention to resolve the parties' disputes.

First, Defendants refuse to engage in discovery for more than a narrow, four-year period. This is improper, as information concerning Epstein's abuse of other girls and young women throughout the span of his sex-trafficking conspiracy is plainly relevant, and therefore discoverable under Rule 26. Defendants deride Plaintiff's allegations as a "sex trafficking *scheme*–which," according to Defendants, "is based on *unproven allegations* in the S.D.N.Y.'s 2019 indictment of Mr. Epstein." ECF No. 52 at 2 (emphases added). But given all that has been discovered about the scope of Epstein's operations and the numerous ways in which Plaintiff's abuse mirrored Epstein's abuse of others, Defendants' argument that Plaintiff "does not need discovery about Mr. Epstein's interactions with other individuals" is baseless. As set forth in Plaintiff's opening letter, "[d]ocuments relating to the sexual trafficking and/or sexual assault of others at any point during that period would make the fact that Epstein trafficked and sexually assaulted Plaintiff, the key fact that Plaintiff bears the burden of proving in this case, more probable than it would be without such evidence." ECF No. 46 at 2. Moreover, Rule 415 (which Defendants fail to address) unambiguously provides that "[i]n a civil case involving a claim for relief based on a party's alleged sexual assault or child molestation, the court may admit evidence that the party committed

any other sexual assault or child molestation." Fed. R. Evid. 415. Defendants are free to attempt to prove Epstein innocent, and can try to prove that the allegations set forth in Plaintiff's complaint and the S.D.N.Y.'s indictment are false. They cannot, however, prevent Plaintiff from accessing the information that would prove otherwise.

Defendants argue that allowing discovery into a period of time greater than four years is somehow "not proportional to the needs of this case and would impose an undue burden on the Co-Executors." ECF No. 52 at 1. But "unsubstantiated claims of undue burden, overbreadth and lack of relevancy" in situations where a party has "produced no documents and answered no interrogatories . . . are a paradigm of discovery abuse." *Jacoby v. Hartford Life & Acc. Ins. Co.*, 254 F.R.D. 477, 478 (S.D.N.Y. 2009). Defendants do not even attempt to quantify what the burden of reviewing documents through the present would be, or how that number would compare to that for the four-year time period they propose. The only information Defendants offer in their letter is a representation that they are "reviewing a database of ***over 730,000 documents***." ECF No. 52 at 1 (emphasis in original). That representation is ambiguous, however, as it sheds no light on (i) how many of those documents Defendants will review (as opposed to just being a number of documents housed on a "database"); (ii) how those documents were collected; or (iii) whether any of those documents are currently being reviewed in response to the discovery requests Plaintiff served in this case (as opposed to those served in cases brought by other victims). And the fact that Epstein's Estate is "large and complicated" does not change Defendants' discovery obligations or the deadlines that this Court imposed. Absent any particularized showing that compliance with Plaintiff's discovery requests would pose an undue burden, Defendants' proposal to limit the discovery period to four years is unfounded. Again, to date Defendants ***have not produced a single document—not one***.

Second, Defendants improperly refuse to answer interrogatories or produce documents that do not specifically reference Plaintiff or the specific instances in which she was abused. Defendants claim that they "have and will continue to search for and produce documents that relate to Plaintiff and her claims of battery and intentional infliction of emotional distress, regardless of whether they specifically reference Plaintiff." ECF No. 52 at 3. As set forth above, however, Plaintiff is entitled to information concerning Epstein's sex-trafficking conspiracy as a whole, including his abuse of others, his communications with his co-conspirators, and the various ways in which he operated his scheme throughout the years. Because the parties' disagreement hinges on whether or not defined topics are discoverable under Rule 26, Defendants' suggestion that the dispute can be resolved by exchanging "bilateral search-term proposals" is disingenuous at best.[1] *Id*. at 3. Court intervention is required now so that Defendants can begin reviewing and producing documents concerning the sex-trafficking conspiracy they are trying to keep secret.

Third, the Court should compel Defendants to answer Plaintiff's interrogatories in full. In a desperate attempt to convince the Court that this issue is somehow "moot" or that Plaintiff's pre-motion letter was "premature," Defendants claim that Plaintiff's request was merely "that Co-

[1] Plaintiff already offered to provide a list of search terms to Defendants, and their counsel responded by stating that Defendants would only consider any other names Plaintiff goes by as search terms. If that was not Defendants' position, they never corrected it or otherwise indicated that they would change it.

Executors supplement their interrogatory responses." ECF No. 52 at 3. To be clear, Plaintiff's anticipated motion will be to compel Defendants to respond meaningfully to all of Plaintiff's interrogatories, which has still not happened despite Defendants' belated "supplementation." Defendants' "supplemental responses," attached hereto as Exhibit A, remain deficient, and only insert cosmetic changes based on information that should have been obvious to Defendants at the time they served their "initial" responses,[2] or parrot back information taken from Plaintiff's complaint and Plaintiff's own production of documents. In any event, each of Defendants' "supplemental" responses "is limited to the Relevant Time Period," which means that Defendants ***still refuse to answer Plaintiff's interrogatories for more than a four-year period***. Court intervention is required to compel Defendants to answer these interrogatories in full.

Finally, although irrelevant to the pending motion concerning *Defendants'* discovery efforts, Plaintiff has fully complied with her discovery obligations to date, and will continue to do so. Defendants complain that Plaintiff included within her productions what they claim are "irrelevant documents from another case," ECF No. 52 at 4, but Plaintiff produced these documents because Defendants specifically asked for the documents identified in Plaintiff's initial disclosures, and Plaintiff correctly produced those documents. Plaintiff has and will continue to engage with opposing counsel in good faith to answer any questions they may have.[3]

For the foregoing reasons, Plaintiff respectfully requests that the Court grant her request for a conference.

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[2] Together with their "supplemental responses," Defendants' served verifications for their "initial responses" on May 13, 2020. Ex. B. Whereas the initial responses were served on April 16, the signatures for the verifications for those responses are dated May 12, 2020, which is the same date as the verifications for the supplemental responses.

[3] In a footnote, Defendants mention a ruling in *Giuffre v. Dershowitz*, which disqualified Boies Schiller Flexner LLP ("BSF") as counsel for another Epstein victim, Virginia Giuffre, in a defamation case brought by that victim against Alan Dershowitz. *Giuffre v. Dershowitz*, 410 F. Supp. 3d 564, 578-79 (S.D.N.Y. 2019). Judge Preska's disqualification of the law firm was not a sanction. Instead, it was based on the advocate-witness rule because Dershowitz claimed that a BSF attorney (while representing the victim) said something to him during a settlement negotiation that would implicate the truth or falsity of one of Dershowitz's allegedly defamatory statements. *Id*. at 579. Indeed, BSF continues to represent Virginia Giuffre before Judge Preska in the *Giuffre v. Maxwell* matter. Defendants disingenuously state that "[t]he Court should be aware" of that ruling, despite the fact that it has nothing to do with whether or not Plaintiff herself was a victim of Epstein's sex-trafficking conspiracy. If Defendants and their counsel are actually seeking to prove Epstein innocent or otherwise insulated from accounting for his misconduct, they should drop their baseless objections to discovery, stop ad hominem attacks on counsel, cease their delay tactics, and welcome a trial on the merits.

Respectfully submitted,

/s/ Sigrid S. McCawley

Sigrid S. McCawley, Esq.

cc: Counsel of Record (via ECF)

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1000, *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-10577-LJL-DCF

DEFENDANTS' OBJECTIONS AND SUPPLEMENTAL RESPONSES TO PLAINTIFF JANE DOE 1000'S FIRST SET OF INTERROGATORIES TO DEFENDANTS

Defendants Darren K. Indyke and Richard D. Kahn, as co-executors of the estate of Jeffrey E. Epstein (the "Co-Executors"), by their attorneys, pursuant to Federal Rules of Civil Procedure 26 and 33, provide the following supplemental responses to Plaintiff Jane Doe 1000's ("Plaintiff") First Set of Interrogatories to Defendants (the "Interrogatories").

RESERVATION OF RIGHTS

These supplemental responses are made solely for the purpose of and in relation to discovery in the above-captioned action. The Co-Executors submit these supplemental responses subject to, and without intending to waive, and expressly preserving: (i) any objections as to relevancy, materiality, competency, privilege and admissibility of any documents and information produced in discovery, including without limitation herein; and (ii) the right to object to any other discovery requests. The Co-Executors have been placed in charge of a large and complex estate and are working to determine the existence of responsive information concerning the affairs of Jeffrey E. Epstein ("Decedent") and those efforts are continuing. Much of the requested information is outside of their knowledge, possession or control. To the extent non privileged

responsive information would be available to them at all, access to such information has been severely hampered by the current pandemic. Accordingly, Co-Executors reserve their right to amend or further supplement these responses if and when appropriate. Further, these supplemental responses are neither an admission nor acceptance of any alleged facts, including without limitation those stated in the Interrogatories.

SPECIFIC OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

The Co-Executors incorporate their initial objections to the definitions and instructions as if stated fully herein.

SPECIFIC OBJECTIONS AND SUPPLEMENTAL RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1

List the names and addresses of all persons who are believed or known by You, Your agents, or Your attorneys to have any knowledge concerning any of the issues in this lawsuit, and specify the subject matter about which the witness has knowledge.

SUPPLEMENTAL RESPONSE:

The Co-Executors object to Interrogatory No. 1 on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors also object to Interrogatory No. 1 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome.

Subject to and without waiving the foregoing objections, the Co-Executors identify the following individual who has knowledge concerning the battery and intentional infliction of emotional distress allegedly committed by Decedent against Plaintiff: Plaintiff.

In addition, in her Complaint, Plaintiff identifies the following individuals with whom she

has interacted with or communicated with: any unidentified individuals housed with Plaintiff in the location described in paragraph 40 of the Complaint; Ghislaine Maxwell; the alleged "additional unidentified co-conspirators" referenced in paragraph 40 of the Complaint; the unidentified individual described in paragraph 43 of the Complaint; and the unidentified individual described in paragraph 46 of the Complaint. Co-Executors do not know whether these individuals ever spoke with or interacted with Plaintiff, or have knowledge concerning Plaintiff's allegations.

In addition, the Co-Executors identify the following individuals, believed to have worked at Decedent's homes in New York and Palm Beach, Florida, which are the only places where Plaintiff alleges she encountered Decedent, during the period from November 1999 to 2002, which based upon the allegations of the Complaint, appears to cover the entire time period during which Plaintiff's claims accrued (the "Relevant Time Period"): Luciano Fontanilla, Rosalyn Fontanilla, Richard Barnett, Ghislaine Maxwell, Juan Alessi, Maria Alessi and Adam Perry Lang. Co-Executors do not know whether these individuals ever spoke with or interacted with Plaintiff, or have knowledge concerning Plaintiff's allegations.

To the extent additional individuals are identified in response to other interrogatories, those individuals may, but do not necessarily, have such knowledge. The Co-Executors' search for relevant information remains ongoing; they will supplement this response if and when any additional responsive information is ascertained.

INTERROGATORY NO. 2

Identify all email accounts used by Epstein or any of his employees or agents on his behalf.

SUPPLEMENTAL RESPONSE:

The Co-Executors object to Interrogatory No. 2 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also

overly broad and unduly burdensome. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it is unconstrained by time. Accordingly, Co-Executors' response is limited to the Relevant Time Period.

Subject to and without waiving the foregoing objections, the Co-Executors state that it is their understanding that the email addresses listed below were created for or on behalf of Decedent, but only jeevacation@gmail.com and jeeproject@yahoo.com were actively used by Decedent himself. Moreover, Co-Executors currently do not believe that jeevacation@gmail.com existed or was in use during the Relevant Time Period and do not know whether jeeproject@yahoo.com was in use during the Relevant Time Period:

- columbiadental1@yahoo.com
- jeevacation@me.com
- jeevacation1@me.com
- jeeproject@yahoo.com
- jeevacation@gmail.com
- jeffrey@jeffreyepstein.org
- jeffreyepsteinorg@gmail.com
- jeffreyepsteinorg@yahoo.com
- jeffreyepstein@live.com
- jeeitunes@gmail.com
- littlestjeff@yahoo.com

The Co-Executors' search for relevant information remains ongoing; they will supplement this response if and when any additional responsive information is ascertained.

INTERROGATORY NO. 3

Identify all telephone numbers used by Epstein or any of his employees or agents acting on his behalf, including beepers, Blackberry or PDA devices, cellular phones and land lines in any of his residences, by stating the users name, complete telephone number(s), type of device and name of the service provider.

SUPPLEMENTAL RESPONSE:

The Co-Executors object to Interrogatory No. 3 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also

overly broad and unduly burdensome. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it is unconstrained by time. Accordingly, Co-Executors' response is limited to the Relevant Time Period.

Subject to and without waiving the foregoing objections, the Co-Executors state that it is their understanding that the following phone numbers were used by Decedent or registered to properties where Decedent stayed at different times, but are unaware of the specific time period that the numbers were in use:

340-775-8111
340-775-8112
340-775-8113
340-775-8114
340-775-8100
340-775-8101
340-775-8102
340-775-8103
340-775-8104
340-775-8105
340-775-8106
340-775-8107
340-775-8108
340-775-8109
340-775-8110
340-775-8115
340-775-8116
340-775-8117
340-775-8118
340-775-8119
340-775-8120

340-775-8121
340-775-8122
340-775-8123
340-775-8124
340-775-8125
340-775-8126
340-775-8127
340-775-8128
340-775-8129
340-775-8130
340-775-8131
340-775-8132
340-775-8133
340-775-8134
340-775-8135
340-775-8136
340-775-8137
340-775-8138
340-775-8139
340-775-8140
340-775-8141
340-775-8142

340-775-8143
340-775-8144
340-775-8145
340-775-8146
340-775-8147
340-775-8148
340-775-8149
561-655-7626
561-655-7629
561-832-2104
561-805-8663
561-655-3572
561-655-3704
561-655-2312
561-655-2779
505-938-2929
505-938-2930
505-938-2928
505-938-3065
505-938-3066
505-938-3069
505-938-3071

347-603-2935
505-377-3854
505-934-1256

(212) 533-3739

505-938-3072
505-988-3071
505-832-4900
505-832-4970
505-832-4983
505-832-5369
505-832-5401
212-772-9416
212-249-1113
212-249-1166
212-249-9457

212-472-1411
212-472-4883
212-535-5198
212-535-5297
212-717-4672
212-249-1122
212-327-1608
212-879-3281
212-750-9895

The Co-Executors' search for relevant information remains ongoing; they will supplement this response if and when any additional responsive information is ascertained.

INTERROGATORY NO. 4

Identify all employees, including each employee's position and dates and locations of employment, who performed work or services in or on any property owned, leased, occupied, or used by Epstein, including but not limited Epstein's homes in Palm Beach, Florida, New York City, the U.S. Virgin Islands, New Mexico, London and Paris, and provide the name and contact information of the individual who hired, trained and supervised each employee.

SUPPLEMENTAL RESPONSE:

The Co-Executors object to Interrogatory No. 4 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it is unconstrained by time. Accordingly, Co-Executors' response is limited to those individuals who are believed to have worked during the Relevant Time Period at Decedent's homes in New York and Palm Beach, Florida, which are the only places where Plaintiff alleges she encountered Decedent. Co-Executors do not know whether these individuals ever spoke with or interacted with Plaintiff during the Relevant Time Period.

Subject to and without waiving the foregoing objections, the Co-Executors identify the following individuals:

- Luciano Fontanilla
- Rosalyn Fontanilla
- Richard Barnett
- Ghislaine Maxwell
- Juan Alessi
- Maria Alessi
- Adam Perry Lang

The Co-Executors' search for relevant information remains ongoing; they will supplement this response if and when any additional responsive information is ascertained.

INTERROGATORY NO. 5

Identify all employees, including each employee's position and dates and location of employment, who performed work as an assistant, scheduler, secretary, masseuse or traveling masseuse for Epstein and provide the name and contact information of the individual who hired, trained and supervised each employee.

SUPPLEMENTAL RESPONSE:

The Co-Executors object to Interrogatory No. 5 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds that the terms "scheduler" and "traveling masseuse" are vague and ambiguous. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it is unconstrained by time. Accordingly, Co-Executors' response is limited to the Relevant Time Period.

Subject to and without waiving the foregoing objections, Co-Executors identify Lesley Groff and Sarah Kellen, who were Decedent's assistants during a portion of the Relevant Time Period. Co-Executors do not know whether Ms. Groff or Ms. Kellen ever spoke with or interacted with Plaintiff. Subject to and without waiving the foregoing objections, Co-Executors refer

Plaintiff to the documents produced by Plaintiff at Bates Nos. JDOE 3736-3832, which purports to list contact information for masseuses. Co-Executors do not know whether any individuals identified therein are masseuses or if those individuals provided massages to Decedent during the Relevant Time Period. The Co-Executors' search for relevant information remains ongoing; they will supplement this response if and when any additional responsive information is ascertained.

INTERROGATORY NO. 6

Identify all companies and/or persons who provided transportation services to Epstein, whether as an employee or independent contractor, including without limitation drivers, chauffeurs, boat captains, pilots, and aircraft crew, and provide the contact information for each listed person or company.

SUPPLEMENTAL RESPONSE:

The Co-Executors object to Interrogatory No. 6 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case, as Plaintiff does not allege that she traveled anywhere with Decedent; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds that the phrase "transportation services" is vague and ambiguous. The Co-Executors further object to this Interrogatory on the grounds and to the extent that is unconstrained by time. Accordingly, Co-Executors' response is limited to the Relevant Time Period.

Subject to and without waiving the foregoing objections, the Co-Executors state the following were individuals who provided air transportation services to Decedent during the Relevant Time Period:

- David Rodgers
- Larry Visoski
- Larry Morrison

Subject to and without waiving the foregoing objections, Co-Executors identify Shoppers Travel, Inc., which is a travel agency that provided travel-related services to Decedent during the Relevant Time Period.

The Co-Executors' search for relevant information remains ongoing; they will supplement this response if and when any additional responsive information is ascertained.

INTERROGATORY NO. 7

Identify all females by name and age for whom Epstein or his employees or agents provided accommodations at 301 East 66th Street, New York, New York for any period of time.

SUPPLEMENTAL RESPONSE:

The Co-Executors object to Interrogatory No. 7 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds that the phrase "provided accommodations" is vague and ambiguous. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it is unconstrained by time. Accordingly, Co-Executors' response is limited to the Relevant Time Period.

Subject to and without waiving the foregoing objections, the Co-Executors state the following individuals stayed at 301 East 66th Street, New York, New York for some period of time, but it is unknown whether any of them stayed at 301 East 66th Street, New York, New York during the Relevant Time Period:

- Roslyn Fontanilla
- Susan Hamblin
- Sarah Kellen

Co-Executors do not know whether the individuals listed have ever spoke with or interacted with Plaintiff during the Relevant Time Period. The Co-Executors' search for relevant information

remains ongoing; they will supplement this response if and when any additional responsive information is ascertained.

INTERROGATORY NO. 8

Identify by name and age all persons who gave a massage or were asked to give a massage to Epstein, Maxwell or a guest, or to whom Epstein or Maxwell gave a massage, at any of Epstein's residences and provide the location of each massage.

SUPPLEMENTAL RESPONSE:

The Co-Executors object to Interrogatory No. 8 on the grounds and to the extent that it calls for the production of information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or protection from disclosure. The Co-Executors further object on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it is unconstrained by time. Accordingly, Co-Executors' response is limited to the Relevant Time Period.

Subject to and without waiving the foregoing objections, Co-Executors refer Plaintiff to the documents produced by Plaintiff at Bates Nos. JDOE 3736-3832, which purports to list contact information for masseuses. Co-Executors do not know whether any individuals identified therein are masseuses or if those individuals provided massages to Decedent during the Relevant Time Period. The Co-Executors' search for relevant information remains ongoing; they will supplement this response if and when any additional responsive information is ascertained.

INTERROGATORY NO. 12

Identify any telecommunications, information technology, or audio-visual technology company that Epstein hired for work in any of his residences or offices and provide the name and contact information for each individual or company listed, in addition to the residence or office serviced.

SUPPLEMENTAL RESPONSE:

The Co-Executors object to Interrogatory No. 12 on the grounds that it seeks information that is neither relevant to Plaintiff's claims nor proportional to the needs of this case; it is also overly broad and unduly burdensome. The Co-Executors also object to this Interrogatory on the grounds that the phrase "hired for work" is vague and ambiguous. The Co-Executors further object to this Interrogatory on the grounds and to the extent that it is unconstrained by time. Accordingly, Co-Executors' response is limited to the Relevant Time Period.

Subject to and without waiving the foregoing objections, the Co-Executors believe that Mark Lundberg may have performed information technology work in some or all of Decedent's homes during the Relevant Time Period.

The Co-Executors' search for relevant information remains ongoing; they will supplement this response if and when any additional responsive information is ascertained.

Dated: New York, New York
May 13, 2020

TROUTMAN SANDERS LLP

By: */s/Bennet Moskowitz*
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Attorney for Darren K. Indyke and Richard D. Kahn, as co-executors of the estate of Jeffrey E. Epstein

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1000, *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-10577-LJL-DCF

VERIFICATION

Darren K. Indyke and Richard D. Kahn, as Co-Executors of the estate of Jeffrey E. Epstein (the "Co-Executors"), have read the foregoing *Co-Executors' Objections and Supplemental Responses to Plaintiff's First Set of Interrogatories* and are familiar with its contents. The responses are subject to inadvertent and undiscovered errors and are based on information available at this stage of discovery. The Co-Executors reserve the right to amend the responses if it appears at any time that omissions or errors have been made therein or that more accurate or additional information is available. Subject to the limitations set forth herein and to the best of their knowledge and belief, Mr. Indyke and Mr. Kahn, solely in their capacities as Co-Executors, state that the answers contained therein are true and correct.

I state under penalty of perjury that the foregoing is true and correct. Executed on May 12, 2020

Darren K. Indyke
Co-Executor of the Estate of Jeffrey E. Epstein

I state under penalty of perjury that the foregoing is true and correct. Executed on May 12, 2020

Richard D. Kahn
Co-Executor of the Estate of Jeffrey E. Epstein

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1000, *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-10577-LJL-DCF

VERIFICATION

Darren K. Indyke and Richard D. Kahn, as Co-Executors of the estate of Jeffrey E. Epstein (the "Co-Executors"), have read the *Co-Executors' Objections and Responses to Plaintiff's First Set of Interrogatories*, dated April 16, 2020, and are familiar with its contents. The responses are subject to inadvertent and undiscovered errors and are based on information available at this stage of discovery. The Co-Executors reserve the right to amend the responses if it appears at any time that omissions or errors have been made therein or that more accurate or additional information is available. Subject to the limitations set forth herein and to the best of their knowledge and belief, Mr. Indyke and Mr. Kahn, solely in their capacities as Co-Executors, state that the answers contained therein are true and correct.

I state under penalty of perjury that the foregoing is true and correct. Executed on May 12, 2020

Darren K. Indyke
Co-Executor of the Estate of Jeffrey E. Epstein

I state under penalty of perjury that the foregoing is true and correct. Executed on May 12, 2020

Richard D. Kahn
Co-Executor of the Estate of Jeffrey E. Epstein