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August 13, 2021

VIA ECF

Hon. Debra C. Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *Jane Doe v. Darren K. Indyke and Richard D. Kahn, in their capacities as the Executors of the Estate of Jeffrey E. Epstein, 1:20-cv-02365-LJL-DCF*

Dear Judge Freeman:

We represent Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (the "Co-Executors"), in the above-referenced action. We write pursuant to Your Honor's Individual Practices § (III)(B) to request approval to file the Co-Executors' Statement on Plaintiff's Application to Proceed Anonymously ("Statement") with redactions to ensure Plaintiff's identity is not made public pending the Court's determination of her Application (ECF No. 29) (the "Application"). The unredacted and redacted versions of the Statement and accompanying Declaration of Bennet J. Moskowitz¹ are being filed under seal and publicly, respectively, contemporaneously herewith in accordance with Individual Practices § (III)(B).

As a matter of context, on March 17, 2020, Plaintiff filed her complaint under the pseudonym "Jane Doe." (ECF No. 1.) On July 30, 2021, Plaintiff filed the Application, requesting approval to prosecute this lawsuit pseudonymously. The Co-Executors have never sought to prevent any alleged victim of Mr. Epstein from proceeding under a pseudonym—and they do not do so here. However, in this unique situation, the Co-Executors have determined that it is appropriate to bring to the Court's attention material facts not contained in Plaintiff's Application so that the Court may rule on it with the benefit of all relevant information and case law.

¹ The exhibits to the Declaration are filed entirely under seal.

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Respectfully submitted,

/s/ Bennet J. Moskowitz

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cc: Counsel of Record (via ECF)