

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANASTASIA DOE,	:	
	:	
Plaintiff,	:	
	:	Index No. 1:19-cv-11869-MKV-DCF
v.	:	
	:	
DARREN K. INDYKE AND RICHARD D.	:	
KAHN, AS CO-EXECUTORS OF THE	:	
ESTATE OF JEFFREY E. EPSTEIN,	:	
	:	
Defendants.	:	
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JOINT PROPOSED DISCOVERY SCHEDULE

Pursuant to the Court's Order dated January 14, 2020 and Rule 26(f)(3) of the Federal Rule of Civil Procedure, Plaintiff Anastasia Doe and Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, the "Co-Executors", and together with Plaintiff, the "Parties") hereby jointly submit the following proposed discovery schedule:

1. The Parties shall serve their initial disclosures pursuant to Rule 26(a)(1) no later than February 7, 2020;
2. Plaintiff shall provide HIPAA-compliant medical records release authorizations to the Co-Executors no later than 14 days from the request therefor;
3. The Parties shall serve initial document requests and interrogatories no later than 30 days from the Court's entry of the discovery schedule;
4. Any motion for joinder of other parties or amendment of the pleadings shall be made no later than 45 days from the Court's entry of the discovery schedule;
5. Fact discovery shall be completed no later than 140 days from the Court's entry of the discovery schedule;
6. Expert disclosures and expert discovery shall be completed no later than 200 days from the Court's entry of the discovery schedule; and

7. The Parties shall have 30 days from the service of an expert's initial report to serve a rebuttal report.

At this time, the Parties anticipate that discovery may be needed on the following subjects: (1) Mr. Epstein's alleged torts committed against Plaintiff and (2) Plaintiff's alleged damages.

Within 14 days from the Court's entry of the discovery schedule, the Co-Executors will provide Plaintiff with a standard, proposed electronically stored information ("ESI") protocol in order to address any issues about disclosure, discovery, or preservation of ESI, including the form or forms in which it should be produced.

Within 14 days from the Court's entry of the discovery schedule, the Co-Executors will provide Plaintiff with a proposed protective order, with standard clawback provisions, to address any issues about claims of privilege or of protection as trial-preparation materials.

At this time, the Parties have no proposed changes to the limitations on discovery imposed by the Federal Rules of Civil Procedure or by the Local Rules of the United States District Court for the Southern District of New York.

With the exception of the protective order mentioned above, the Parties are not currently aware of any other orders that the Court should issue under Rule 26(c) or under Rule 16(b) and (c).

The Parties respectfully request that the Court enter this joint proposed discovery schedule in this matter.

Dated: New York, New York
February 6, 2020

By: /s/ Brad Edwards

Brad Edwards
EDWARDS POTTINGER LLC
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301

Attorney for Plaintiff

By: /s/ Bennet J. Moskowitz

Bennet J. Moskowitz
TROUTMAN SANDERS LLP
875 Third Avenue
New York, New York 10022

Attorney for Defendants