

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

JOINT STIPULATION AND [PROPOSED] ORDER STAYING ACTION

WHEREAS independent claims administration experts have designed and are implementing the Epstein Victims' Compensation Program (the "Program") to resolve sexual abuse claims against decedent Jeffrey E. Epstein ("Decedent") in a non-adversarial alternative to litigation; and

WHEREAS Plaintiff Jane Doe 1000 ("Plaintiff," and together with Defendants, Darren K. Indyke and Richard D. Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein, the "Parties"), seeks to participate in the Program; and

WHEREAS the Parties seek to preserve their resources and judicial economy by staying this action for sixty (60) days while Plaintiff participates in the Program; and

WHEREAS should Plaintiff resolve her claims against Decedent via the Program, Plaintiff will promptly discontinue this action with prejudice.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that:

1. The captioned action is hereby stayed, both as to discovery and to the resolution of any pending motions, for sixty (60) days from the date of entry of this Order.

2. After the expiration of the stay, if any, the Parties will confer on a schedule for the remaining discovery in this action.

Dated: June 12, 2020
New York, New York

Respectfully submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ **Sigrid McCawley**
Sigrid McCawley
401 E. Las Olas Blvd. Suite 1200
Fort Lauderdale, FL, 33301
(954) 377 4223
smccawley@bsflp.com

Attorneys for Plaintiff

TROUTMAN SANDERS LLP

By: /s/ **Bennet J. Moskowitz**
Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
(212) 704-6000
bennet.moskowitz@troutman.com

Attorneys for Defendants

Date: _____, 2020
New York, New York

HON. DEBRA C. FREEMAN
United States Magistrate Judge