

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VE,

Plaintiff,

v.

DARREN K. INDYKE AND RICHARD D. KAHN,
AS JOINT PERSONAL REPRESENTATIVES OF
THE ESTATE OF JEFFREY E. EPSTEIN, NINE
EAST 71st STREET, CORPORATION, FINANCIAL
TRUST COMPANY, INC., NES, LLC,

Defendants.

Case No. 1:19-07625-AJN-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 VE ("Plaintiff," and together with Defendants, Darren K. Indyke and Richard D. Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein, Nine East 71st Street, Corporation, Financial Trust Company, Inc., and NES, LLC, the "Parties") seeks to participate in the Program; and

WHEREAS the Parties seek to preserve their resources and judicial economy by staying this action unless and until Plaintiff elects to resume the litigation and requests the stay be lifted; and

WHEREAS should Plaintiff resolve her claims against Defendants via the Program, the Parties will thereafter 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 pending further Order of the Court.
2. After the lifting 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,
EDWARDS POTTINGER LLC

By: /s/ Brad Edwards

Brad Edwards
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Tel: (954) 524-2820
brad@epllc.com

Attorneys for Plaintiff

TROUTMAN SANDERS LLP

By: /s/Bennet 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 District Judge