

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                                    |   |                                      |
|------------------------------------|---|--------------------------------------|
| -----                              | X |                                      |
| VE,                                | : |                                      |
|                                    | : |                                      |
| Plaintiff,                         | : |                                      |
|                                    | : | Index No. 1:19-cv-07625-AJN          |
| v.                                 | : |                                      |
|                                    | : | <b>DECLARATION IN SUPPORT OF</b>     |
| DARREN K. INDYKE AND RICHARD D.    | : | <b>DEFENDANTS' MOTION TO DISMISS</b> |
| KAHN, AS JOINT PERSONAL            | : | <b>PLAINTIFF'S FIRST AMENDED</b>     |
| REPRESENTATIVES OF THE ESTATE OF   | : | <b><u>COMPLAINT</u></b>              |
| JEFFREY E. EPSTEIN, NINE EAST 71st | : |                                      |
| STREET, CORPORATION, FINANCIAL     | : |                                      |
| TRUST COMPANY, INC., NES, LLC,     | : |                                      |
|                                    | : |                                      |
| Defendants.                        | : |                                      |
| -----                              | X |                                      |

BENNET J. MOSKOWITZ hereby declares as follows:

1. I am a member of the bar of the State of New York.
2. I am a partner at Troutman Sanders LLP, counsel of record for Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein, Nine East 71st Street, Corporation, Financial Trust Company, Inc., and NES, LLC (together, "Defendants").
3. I am fully familiar with the facts and circumstances set forth herein.
4. I submit this declaration in support of Defendants' Motion to Dismiss Plaintiff VE's First Amended Complaint (ECF #3).
5. The sole purpose of this Declaration is to place before the Court a copy of Plaintiff's First Amended Complaint, which is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 29, 2019  
New York, New York

/s/ Bennet J. Moskowitz  
Bennet J. Moskowitz