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January 2, 2020

**ECF**

Hon. Lorna G. Schofield  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Jane Doe 1000 v. Darren K. Indyke and Richard D. Kahn in their capacities as the executors of the Estate of Jeffrey Edward Epstein, Case No. 19-cv-10577-LGS***

Dear Judge Schofield:

We represent Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, “Defendants”) in the referenced action. Defendants respectfully request that the Court refer this action to Magistrate Judge Debra C. Freeman for General Pretrial (including scheduling, discovery, non-dispositive pretrial motions, and settlement). Plaintiff consents to this request.

As a matter of context, several other Judges in this District have collectively referred to Magistrate Freeman for General Pretrial numerous actions against Defendants in their capacities as Co-Executors of the Estate of Jeffrey E. Epstein, including two actions in which the parties are represented by the respective counsel of record in this action.<sup>1</sup> Magistrate Freeman held a status conference on November 21, 2019, which counsel of record for the parties to this action attended. Magistrate Freeman requested the parties in the matters referred to Her Honor to submit status reports on January 10, 2020.

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<sup>1</sup>See *Teresa Helm v. Darren K. Indyke and Richard D. Kahn, in their capacities as the executors of the Estate of Jeffrey Edward Epstein, Case No. 19-cv-10476-PGG-DCF*, Order of Reference (ECF Doc. 6) (S.D.N.Y. Nov. 21, 2019); *Juliette Bryant v. Darren K. Indyke and Richard D. Kahn, in their capacities as the executors of the Estate of Jeffrey Edward Epstein, Case No. 19-cv-10479-ALC-DCF*, Order of Reference (ECF Doc. 8) (S.D.N.Y. Dec. 26, 2019).

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The parties are aware that this Court had planned for the parties to submit Joint Letters and Civil Case Management Plans and Scheduling Orders today. However, in light of this request for referral to Magistrate Judge Freeman, the parties request the Court's guidance on whether these documents should be submitted.

Respectfully submitted,

s/Bennet J. Moskowitz  
Bennet J. Moskowitz