

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS & ST. JOHN**

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**IN THE MATTER OF THE ESTATE OF** )  
**JEFFREY E. EPSTEIN,** )  
 )  
**Deceased.** )  
\_\_\_\_\_ )

**PROBATE NO. ST-19-PB-80**  
**ACTION FOR TESTATE**  
**ADMINISTRATION**

19 OCT 31 PM 4: 13  
SUPERIOR COURT  
OF THE VIRGIN ISLANDS

**MOTION FOR EXTENSION OF TIME TO FILE INVENTORY**

COME NOW Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (the "Estate"), by and through their undersigned counsel KELLERHALS FERGUSON KROBLIN PLLC, and hereby move this Honorable Court for an Order extending the time to file an inventory of all real and personal property of the Decedent.

**I. ADDITIONAL TIME TO SUBMIT A COMPREHENSIVE INVENTORY IS WARRANTED DUE TO THE COMPLEXITY AND UNIQUE CHALLENGES OF THE ESTATE**

**A. Summary**

As noted in the prior filings in this proceeding, the Estate includes property of the Decedent consisting, in part, of stock of Virgin Islands corporations that, in turn, own real estate and other property located in five different jurisdictions, namely the Virgin Islands, France, Florida, New Mexico and New York. As set forth in the inventory in the Petition for Probate, the estimated date of death value of the Decedent's property is believed to be in excess of \$570 million.

The Executors are in the process of engaging licensed and qualified appraisers in each jurisdiction who, as part of the appraisal process, will inventory all of the Decedent's property and assets. Due to the sheer volume and the unique nature and the location of these assets, the Executors respectfully request additional time to file a comprehensive inventory.

**B. The Court May Grant Additional Time Pursuant to 15 V.I.C. § 312**

The Order entered by this Court on September 6, 2019 directs the Executors to file an inventory by October 31, 2019, pursuant to 15 V.I.C. § 312.<sup>1</sup>

However, Section 312 authorizes the court to allow additional time in its discretion, if circumstances so require. *Id.*

Further, 15 V.I.C. § 314 provides that, “**before** the inventory referred to in section 312 of this title is filed, the property therein specified which is in this territory shall be appraised at its true cash value by two disinterested and competent persons, who shall be appointed by the court.” 15 V.I.C. § 314(a) (emphasis added).

On September 26, 2019, the Executors timely filed a motion which is pending before the Court for additional time to appoint appraisers to appraise the entire inventory.

**C. Additional Time is Warranted**

The requirement of the statute that the property listed in the inventory be appraised before the inventory is filed will take more than the usual amount of time in the instant matter. Before a complete inventory can be filed, the Executors must formally hire licensed and qualified appraisers in each jurisdiction who must, in turn, have an opportunity to review and appraise the property wherever situated. They are well into this process, although coordinating appraisals in five different jurisdictions presents unique challenges. Suffice it to say that the sheer volume and unique character of Decedent’s assets requires more than the usual amount of time to prepare an inventory. Given the unusual circumstances present here, including the nature, quantity, character,

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<sup>1</sup> Section 312 provides in full: “An executor or administrator shall within one month from the date of his appointment, or such further time as the court may allow, make and file with the clerk of the court an inventory, verified by his oath, of all the real and personal property of the deceased which comes to his possession or knowledge.”

and diverse locations of the property to be inventoried, the Executors respectfully request an extension of time.

**D. Conclusion**

Due to the volume and value of decedent's property to be appraised and the number of different jurisdictions in which such property is located, preparing the inventory for the Estate requires significantly more time, effort and challenge than that associated with the typical estate. Notwithstanding the Executors' best efforts, they require additional time to complete this process. Accordingly, the Executors seek an extension of one-hundred twenty (120) days from the date hereof to file a more complete inventory of the decedent's worldwide property, which is subject to probate in the Virgin Islands.

Respectfully,

Dated: October 31, 2019



**CHRISTOPHER ALLEN KROBLIN, ESQ.**  
**ANDREW W. HEYMAN, ESQ.**  
**WILLIAM L. BLUM, ESQ.**  
**SHARI N. D'ANDRADE, ESQ.**  
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**ORDER**

**THIS MATTER** is before the Court on the Co-Executors' Motion for Extension of Time to File Inventory. Having reviewed the Motion and being satisfied in its premise, the Court will grant the same.

Accordingly, it is hereby:

**ORDERED** that the Co-Executors' Motion for Extension of Time to File Inventory is **GRANTED**; and it is further

**ORDERED** that the Co-Executors shall have an additional one hundred twenty (120) days to file an inventory; and it is further

**ORDERED** that a copy of this Order shall be directed to counsel of record.

Dated: \_\_\_\_\_

\_\_\_\_\_  
**CAROLYN P. HERMON-PERCELL**  
Magistrate Judge of the Superior Court  
of the Virgin Islands

**ATTEST: ESTRELLA H. GEORGE**  
Clerk of the Court

**BY:** \_\_\_\_\_

Court Clerk Supervisor \_\_\_\_ / \_\_\_\_ / \_\_\_\_