

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

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

PROBATE NO. ST-19-PB-80

19 NOV -4 PM 1:47  
SUPERIOR COURT  
THE VIRGIN ISLANDS

**NOTICE OF FILING**  
**MOTION TO PROCEED ANONYMOUSLY**  
**IN FILING NOTICES OF CLAIM**

COMES NOW, the undersigned counsel on behalf of numerous victims of the Estate of Jeffrey E. Epstein and submits for the consideration of the Court the attached Motion to Proceed Anonymously in Filing Notices of Claim.

DATED: 11/4/2019

Respectfully Submitted,



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**MOTION TO PROCEED ANONYMOUSLY**  
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COMES NOW, the undersigned counsel on behalf of numerous victims of the Estate of Jeffrey E. Epstein, and files this Motion to Proceed Anonymously in Filing Notices of Claim, and in support thereof states as follows:

Pursuant to Virgin Islands Probate and Fiduciary Rule 11 titled *Notice to Creditors and Persons Indebted to the Estate*, “[a]ll persons having claims against the estate are required to present all claims within six months from the date of this notice, verified by affidavit,” *see also 15 V.I.C. § 391* Publication of Notice of Administration.

The undersigned currently represents fifteen victims who have claims to be made against the Estate of Jeffrey E. Epstein. To date, the following cases have been filed in the Southern District of New York—*VE v. Nine East 71st Street et al.*, No. 19-cv-07625 (S.D.N.Y.) (Nathan, J.); *Doe v. Darren K. Indyke and Richard D. Kahn et al.*, No. 19-cv-07771 (S.D.N.Y.) (Castel, J.); *Doe v. Darren K. Indyke and Richard D. Kahn et al.*, No. 19-cv-07772 (S.D.N.Y.) (Carter, J.); *Doe v. Darren K. Indyke and Richard D. Kahn et al.*, No. 19-cv-07773 (S.D.N.Y.) (Ramos, J.). All of the foregoing cases were filed anonymously, and it is anticipated that all future cases will be filed anonymously, in an effort to protect the identity and privacy of Mr. Epstein’s victims.

On September 12, 2019, Federal United States District Court Southern District of New York Judge P. Kevin Castel entered an Order granting Plaintiff Katlyn Doe's Motion to Proceed Anonymously in her Federal Court action. *See* Exhibit A [DE 28], Case 1:19-cv-07771-PKC. Likewise, undersigned counsel respectfully requests that this Court grant each Claimant under its representation the ability to present her Notice of Claim anonymously under pseudonym.

Allowing Plaintiff to proceed anonymously will protect her highly sensitive personal information that will remain the focus of this litigation. There is no prejudice to the Estate in allowing each Claimant to proceed anonymously in filing her claim, nor is there any significant public interest in the disclosure of each claimant's identity. In fact, the public interest in this case weighs in favor of granting Claimants' respective requests to proceed anonymously for their protection. *See Doe. No. 2 v. Kolko*, 242 F.R.D. 193, 196 (EDNY 2006), "courts have granted anonymity to protect against disclosure of a wide range of issues involving matters of the utmost intimacy, including sexual assault;" *see also* 1991 McKinney's Sessions Laws of N.Y. at 2211-2212 ("sexual assault victims have unfortunately had to endure a terrible invasion of their physical privacy. They have a right to expect that this violation will not be compounded by a further invasion of their privacy").

The undersigned does not dispute that the Estate of Jeffrey E. Epstein is statutorily entitled to know the true identity of each Claimant asserting a claim against the Estate. For that reason, each Claimant will cooperate with the Court and counsel for the Estate of Jeffrey E. Epstein to provide her true identity for the purposes of complying with her statutory requirement to present her claim, by affidavit, to the Estate. However, each Claimant represented by undersigned counsel respectfully requests that she be permitted to remain anonymous and proceed only by way of pseudonym in any publicly filed document associated with the probate

matter before this Court. For the foregoing reasons, Claimants respectfully request that the Court grant this Motion to Proceed Anonymously.

Consistent with United States District Judge Castel's Order in the Southern District of New York, the undersigned will disclose the identity of each Claimant to counsel for the Estate of Jeffrey E. Epstein in a document to be submitted to the Court for sealing with the understanding that counsel for the Estate of Jeffrey E. Epstein shall not disclose the identity of any Claimant to any person other than counsel for the Estate of Jeffrey E. Epstein without further order of this Court.


Dated: November 4, 2019

Respectfully Submitted,



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