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19 NOV 26 AM 10:48
SUPERIOR COURT
THE VIRGIN ISLANDS

November 19, 2019

VIA CERTIFIED MAIL # 70190700000040565101

Clerk of Court
Superior Court of the Virgin Islands
Probate Division
P.O. Box 70
St. Thomas, USVI 00804

RE: In The Matter Of The Estate Of Jeffrey E. Epstein

Dear Sir/Madam:

Enclosed for filing are the original and two copies of the following document(s) related to the above-referenced case:

- **Notice Of Filing Verification To Claim**
- **Claimant's Response To Executors' Expedited Motion For Establishment Of Voluntary Claims Resolution Program**

We would appreciate your filing the original and returning the copies marked "Filed" to our office in the enclosed self-addressed, postage prepaid envelope.

Very truly yours,

CHANCO SCHIFFER LAW, LLC


Corina Honeycutt,
Paralegal

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

19 NOV 26 AM 10:48
SUPERIOR COURT
THE VIRGIN ISLANDS

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

Case No. ST-19-PB-80

NOTICE OF FILING VERIFICATION TO CLAIM

COMES NOW claimant Jennifer Danielle Araoz by and through undersigned counsel, and hereby notifies the Court that Attached hereto as Exhibit "A" is the verification of Jennifer Danielle Araoz, as required by 15 V.I.C. § 393, attesting her Claim for Unliquidated and Unsecured Damages filed October 15, 2019, is true and correct.

This 19 day of November, 2019.



Douglas B. Chanco
V.I. Bar No.: 2063
Attorney for Claimant
9053 Sugar Estate; Ste. 103
St. Thomas, USVI 00802
340-201-4667
doug@csfirm.com


CERTIFICATE OF SERVICE

It is hereby certified that on this 15 day of November, 2019, I caused a true and correct copy of the foregoing **NOTICE OF FILING VERIFICATION TO CLAIM** to be served via U.S. Mail upon the following:

William Blum, Esq.
KELLERHALS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Ste. 101
St. Thomas, VI 00802

Darren K. Indyke, Executor
c/o KELLERHALS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Ste. 101
St. Thomas, VI 00802

Richard Kahn, Executor
c/o KELLERHALS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Ste. 101
St. Thomas, VI 00802



Douglas B. Chanco

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

19 NOV 26 AM 10:48
SUPERIOR COURT
THE VIRGIN ISLANDS

IN THE MATTER OF THE ESTATE OF) Case No. ST-19-PB-80
JEFFREY E. EPSTEIN,)
)
Deceased.)
)

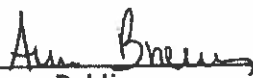
VERIFICATION of JENNIFER DANIELLE ARAOZ

I, Jennifer Danielle Araoz, being first duly sworn upon oath state and depose as follows:
I have read the Claim for Unliquidated and Unsecured Damages submitted to this Honorable
Court on October 15, 2019 and state that the facts set forth therein to the best of my knowledge
are accurate and correct.

This 15 day of November, 2019.


Jennifer Danielle Araoz

Sworn to and subscribed before me
This 15 day of November 2019.


Notary Public ANNA BRANAS
My Commission Expires Qualified in Kings County
Commission Expires February 11 2020



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

SUPERIOR COURT
IN THE VIRGIN ISLANDS
19 NOV 26 AM 10:48

IN THE MATTER OF THE ESTATE OF) JEFFREY E. EPSTEIN,)) Deceased.))	Case No. ST-19-PB-80
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**Claimant's Response to Executors' Expedited Motion for
Establishment of Voluntary Claims Resolution Program**

COMES NOW claimant Jennifer Danielle Araoz, through her attorneys Douglas B. Chanco, Esq. and A. Jeffrey Weiss, Esq. and hereby files this, claimant's response to Executors' Expedited Motion for Establishment of Voluntary Claims Resolution Program in the above styled matter, and states as follows:

1.

Jeffrey Edward Epstein, decedent, died on August 10, 2019, and his death was determined to be a suicide.

2.

Decedent's petition for probate and for letters testamentary lists personal property valued at \$577,672,654.00.

3.

Decedent's petition for probate and for letters testamentary lists total estate property valued at \$577,672,654.00.

4.

On or about October 14, 2019, pursuant to 15 V.I.C. § 391; 15 V.I.C. § 392; 15 V.I.C. § 393 and all other applicable authority, Ms. Araoz presented her timely claim for unliquidated and unsecured damages that are justly due, no payments have been made thereon, and that there is no just counterclaim to the same.

5.

As of the date of this filing, neither the Executor nor the Administrator of Jeffrey E. Epstein's estate have provided notice to claimant rejecting her claim.

6.

Ms. Araoz's claim requires this court to secure sufficient assets from the estate to pay her damages and losses.

7.

Ms. Araoz's claim requires this court to prevent the sale, transfer or waste of any assets in the decedent's estate.

8.

On or about November 14, 2019, Co-Executors Darren Indyke and Richard Kahn petitioned this Court to permit the establishment of a voluntary claims resolution program, using estate funds to retain the proposed program administrator and program designer and also resolve claims against the estate.

9.


Claimant Araoz has no objection to a voluntary program for victims of decedent who want to participate. That being stated, claimant Araoz objects to funding of the claims resolution program through the distribution of assets from the estate of Jeffrey E. Epstein until such time as

all claims are resolved, and requests a hearing before this Honorable Court upon account prior to adjudication and/or distribution as defined in Super. Ct. R. 17 of Probate and Fiduciary Proceedings, 15 V.I.C. § 564, 15 V.I.C. § 565, and all other applicable law.

WHEREFORE Claimant Araoz prays that this Court:

- a. Prevent Co-Executors Indyke and Kahn from funding any claims resolution program through the distribution of assets of the estate of Jeffrey E. Epstein until such time as all claims are resolved;
- b. Claimant receive a Judgment against decedent's estate in an amount sufficient to satisfy Ms. Araoz's Final Judgment in all pending matters, along with interest, attorneys' fees and punitive damages as well as stay of all further proceedings in this matter pending the disposition of Claimant's New York lawsuit against the Estate;
- c. All other relief this Court deems appropriate.

This 19th day of November, 2019.



Douglas B. Chanco, Esq.
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A. J. WEISS & ASSOCIATES
A. Jeffrey Weiss, Esq.
V.I. Bar Number 257
jeff@weisslaw-vi.net
340-777-3011
9053 Sugar Estate; Ste. 103
St. Thomas, USVI 00802
Counselors for Claimant Araoz

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2019, I caused a true and accurate copy of the foregoing response to Executors' Expedited Motion for Establishment of Voluntary Claims Resolution Program to be served on the following:

William Blum, Esq.
KELLERHALS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Ste. 101
St. Thomas, VI 00802

Darren K. Indyke, Executor
c/o KELLERHALS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Ste. 101
St. Thomas, VI 00802

Richard Kahn, Executor
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Counsel for Claimant Araoz