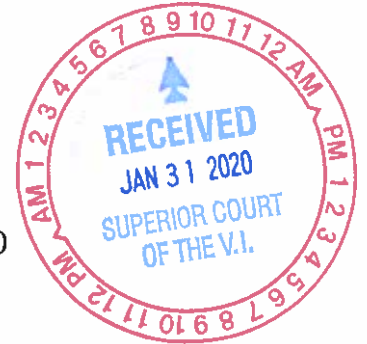


IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN
PROBATE DIVISION

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

Case No. ST-19-PB-80

Deceased.)
_____)

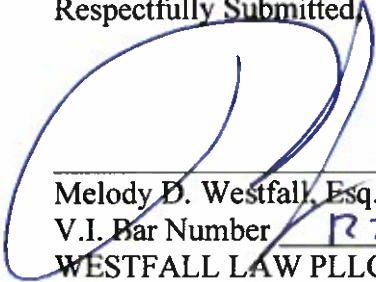


Notice of Filing of Motion to Proceed Anonymously
in Filing a Notice of Claim for Unliquidated and Unsecured Damages

COME NOW, the undersigned counsel, on behalf of Claimant Jane Doe I, a victim of the Estate of Jeffrey E. Epstein, and submit for the consideration of the Court, the attached Motion to Proceed Anonymously in Filing a Notice of Claim for Unliquidated and Unsecured Damages.

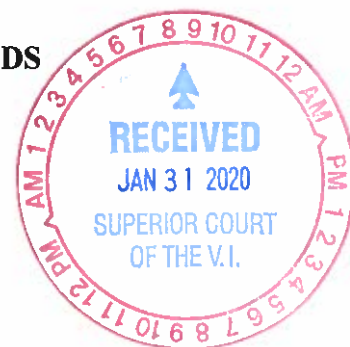
Dated: Christiansted, St. Croix
January 31st, 2020

Respectfully Submitted,



Melody D. Westfall, Esq.
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WESTFALL LAW PLLC
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Attorneys for Claimant Jane Doe I

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



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

Case No. ST-19-PB-80

**Motion to Proceed Anonymously in Filing a
Claim for Unliquidated and Unsecured Damages**

COME NOW, the undersigned counsel, on behalf of Claimant Jane Doe I (“Claimant”), a victim of the Estate of Jeffrey E. Epstein (the “Estate”), and file this Motion to Proceed Anonymously in Filing a Notice of Claim for Unliquidated and Unsecured Damages, and in support thereof state:

1. This motion and the subsequent notice of claim are timely and properly filed pursuant to Virgin Islands Probate and Fiduciary Rule 11 titled Notice to Creditors and Persons Indebted to the Estate which notes that "...all persons having claims against the estate [are] to present, or deliver to the executor or administrator, their claim(s), verified by affidavit, to a place within the territory specific in the notice, within six months from the date of notice..." as such a notice was dated September 13, 2019, filed on September 18, 2019 and directed such claims to be presented to the offices of their attorneys or the Clerk of this Court. See also 15 V.I.C. § 391 Publication of Notice of Administration.

2. The undersigned currently represents twelve victims, including Claimant, who has a claim to be made against the Estate of Jeffrey E. Epstein. On December 3, 2019, nine of those twelve victims, including Claimant, filed suit against the above-referenced Estate and its executors in the Supreme Court of the State of New York, County of New York. See Jane Doe I et al v.

Darren K. Indyke et al (Index No.: 950230/2019) (Hon. George J. Silver, J.S.C.). A true and correct copy of the Summons and Verified Complaint are attached hereto as Exhibit "1".

3. It is important to note that in that complaint, Claimant filed anonymously using the "Jane Doe" pseudonym.

4. Furthermore, on December 5, 2019, Bennet J. Moskowitz of Troutman Sanders LLP, attorneys for the executors of the Estate, filed a stipulation with request to so order Claimant's requests for anonymity on consent from all parties involved in that litigation. Attached hereto as Exhibit "2" is a true and correct of the fully executed stipulation.

5. The only reason that this stipulation has not been so ordered at this time is due to the current Administrative Stay placed on the case, and all other cases of similar nature, pending in the Supreme Court. Attached hereto as Exhibit "3" is a true and correct copy of the Administrative Order of Hon. George J. Silver, J.S.C.

6. Accordingly, the undersigned respectfully requests that this Court also grant Claimant the ability to present her Notice of Claim anonymously under pseudonym.

7. If the fact that both of the parties in this proceeding have already agreed for Claimant to file anonymously is not persuasive enough, courts in this Circuit have also granted such relief even when it is opposed.

8. First and foremost, this sort of decision is within the direct purview of this Court. See Doe v. C.A.R.S. Protection Plus, Inc., 527 F.3d 358, 371 (3rd Cir. 2008) ("[T]he decision whether to allow a [claimant] to proceed anonymously rests within the sound discretion of the court.").

9. Indeed, in making such decisions, courts in this circuit have continually applied a balancing test type approach using several factors outlined by the Third Circuit in the case of Doe

v. Megless and its progeny. See Doe v. Megless, 654 F.3d 404 (3rd Cir. 2011) (“Megless”); see also D.M. v. Cty. of Berks, 929 F. Supp. 2d 390 (E.D. Pa. 2013) (“Berks”); Doe v. Rutgers, 2019 U.S. Dist. LEXIS 75139 (D.N.J. 2019) (“Rutgers”).

10. In this case, it is clear that when applying the nine Megless factors (six that favor anonymity and three that disfavor anonymity), an overwhelming majority of them support Claimant’s use of a pseudonym while the few that do not are either not applicable to the case or do not do enough to tip the scales. See Megless, 654 F.3d at 409.

11. Regarding the first factor in favor of anonymity, the facts of this case stand in sharp contrast to instances where courts have found that anonymity would be futile because the movant’s name was already widely known. See Rutgers at 5-6 (citing to Megless at 410 ([movant’s] name, picture and home address had been disclosed on a publicly circulated flyer)). Here, the facts align more with Rutgers as Claimant has gone above and beyond to maintain her confidentiality, which has never been made public, including by filing her lawsuit as a “Jane Doe” and stipulating with the Estate to the same. See Megless at 410; see also Rutgers, 2019 U.S. Dist. LEXIS 75139 at 5.

12. Second, as for the reasonableness of the harm that the litigant is seeking to avoid, here, similar to the facts of Rutgers, Claimant wishes to proceed anonymously in order to protect her mental and physical health and right to fully and fairly litigate this action. See Rutgers at 6-7; see also Doe v. Roman Catholic Archdiocese of New York, 64 Misc. 3d 1220(A) (Sup Ct., Westchester Cty. 2019).

13. Indeed, as opposed to using a pseudonym merely to avoid the annoyance and criticism that may attend any litigation, Claimant seeks to proceed anonymously to preserve her privacy in this matter of a sensitive and highly personal nature that will have a lifelong impact on her and her families’ lives. See Rutgers at 6-7; see also Doe v. Szul Jewelry Inc., 2008 NY Misc.

LEXIS 8733 (Sup. Ct., New York Cty. 2008); Doe v. New York Univ., 6 Misc. 3d 866 (Sup. Ct., New York Cty. 2004); Sealed Plaintiff v. Sealed Defendant, 537 F.3d 185 (2nd Cir. 2008).

14. Third, unlike Megless where the District Court recognized that there is no allegation that falsely create suspicious person alert are a widespread problem, here the facts are more similar to Berks in that disallowing anonymity would likely deter those who have been falsely accused of sexual abuse from vindicating their rights due to the stigma that invariably attaches from having one's name publicly attached to such a deplorable act. See Megless at 410; see also Berks, 929 F. Supp. 2d at 402.

15. Fourth, similar to Rutgers, there is a strong chance that this claim will not be resolved on its merits if the litigant is denied the opportunity to proceed using a pseudonym as Claimant will potentially sacrifice a potentially valid claim simply to preserve her anonymity. See Rutgers at 7-8. The Court here should decide in conformity with the court in Rutgers where they agreed with the movant's argument that the public is harmed when alleged abuse goes unchallenged because movant's fear litigating publicly. See id.

16. As for the final factor weighing in favor of anonymity, Claimant is not seeking to use a pseudonym for nefarious reasons, nor has there been any allegations that Claimant has an illegal or ulterior motive in her desire to hide her name. See Megless at 411; see also Rutgers at 10. As opposed to simple public humiliation and embarrassment, which have been determined not to be sufficient grounds for allowing a Claimant to proceed anonymously, in this case, there is no "illegitimate ulterior motive", because, as referenced above, identification of Claimant's true identity "poses a risk of mental or physical harm" and the case involves "information of the utmost intimacy". See Megless at 411; see also Rutgers at 10; Doe, 2008 NY Misc. LEXIS at 16-17; Doe, 6 Misc. 3d at 879; Sealed Plaintiff, 537 F.3d at 189-190; 1991 McKinney's Session Laws of New

York 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").

17. Furthermore, even when turning to the other side of the scale and the factors disfavoring anonymity, Claimant still comes out ahead.

18. While Claimant acknowledges that there is a thumb on the scale that is the universal interest in favor of open judicial proceedings, she is not asking the record to be sealed, rather simply to proceed anonymously.

19. Next, the Court must consider "whether, because of the subject matter of this litigation, the status of a litigant as a public figure, or otherwise, there is a particularly strong interest in knowing the litigant's identities." See Megless at 411; see also Rutgers at 12. Here, the Claimant is not a public figure.

20. This litigation also involves "a member of a particularly vulnerable class" or "the subject matter is highly personal," the "public has an interest in protecting the identity of the litigant." See Rutgers at 12 (citing to Doe v. Rider Univ., 2018 U.S. Dist. LEXIS 133146 (D.N.J. 2018)). Here, Claimant alleges that she is a victim of sexual assault, so allowing her to proceed as a "Jane Doe" while preserving the public's right to access the docket and proceedings in this case strikes the appropriate balance between these competing interests. See Rutgers at 12 (citing to L.A. v. Hoffman, 2015 U.S. Dist. LEXIS 94564 (D.N.J. 2015) (granting [movant's] motion to proceed anonymously and observing that "although the identities of the [movants] will not be included in the filings in this matter, the public will maintain access to the docket and filings in this case.")).


21. Finally, the last factor weighing against disclosure is not applicable as there is no party opposing the use of a pseudonym.

22. Applying the factors referenced in the litany of case law to the specific facts of Claimant's case makes clear that she should be permitted to proceed pseudonymously. She is a victim of sexual abuse, a matter of a highly sensitive and personal nature; she is not seeking to avoid mere embarrassment, but rather to protect her physical and mental well-being along; it is well known that victims of sexual crimes are often not believed and have their reputations are put into question, thus identification of her poses a serious risk of retaliatory harm to her; and, the Estate will not be prejudiced because her identity will be known to it and their counsel, and thus they will be able to properly investigate her claim. As such, the Court here should find that the totality of the factors and circumstances favor anonymity.

WHEREFORE, Claimant prays that the Court grant (a) her motion seeking the right to proceeding in this action under pseudonym in its entirety; and, (c) all other further relief as this Court may deem just and proper.

Dated: Christiansted, St. Croix
January 3rd, 2020

Respectfully Submitted,



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mwestfall@westfalllaw.com
(340) 227-0017
Attorneys for Claimant Jane Doe I

CERTIFICATE OF SERVICE

I hereby certify that on January 31st, 2020, I caused a true and correct copy of the foregoing Motion to Proceed Anonymously in Filing a Claim for Unliquidated and Unsecured Damages to be served on the following:

William Blum, Esq.
KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Darren K. Indyke, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Richard Kahn, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Douglas B. Chanco, Esq.
CHANCO SCHIFFER LAW, LLC
9053 Sugar Estate, Suite 103
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A. Jeffrey Weiss, Esq.
A.J. WEISS & ASSOCIATES
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Sean E. Foster, Esq.
Robert V. Goldsmith III, Esq.
MAJORIE RAWLS ROBERTS, P.C.
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Richard P. Bourne-Vanneck, Esq.
RICHARD P. BOURNE-VANNECK, P.C. d/b/a
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Mariann Meier Wang, Esq.
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ALLRED, MAROKO & GOLDBERG
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LAW OFFICE OF JOHN H. BENHAM, P.C.
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P.O. Box 11720
St. Thomas, USVI 00801

EXHIBIT

1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.: _____/19

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,

Plaintiffs designate
NEW YORK COUNTY
as place of trial.

Plaintiffs,

The basis of venue is the
location where a
substantial part of the
events or omissions giving
rise to these claims
occurred, the residence of
at least one plaintiff and
the residence of defendant
Kahn

-against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

SUMMONS

Defendants.

Plaintiffs reside in New
York and other States

-----X
To the above-named defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York) and in case your failure to appear or answer, judgement will be taken for the relief demanded herein.

A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT, NEW YORK COUNTY ON 12/3/19 IN COMPLIANCE WITH CPLR §§305(a) AND 306(a).

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: Jordan Merson
Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

Defendants' Addresses:

**RICHARD D. KAHN, in his capacity as a co-executor
of the ESTATE OF JEFFREY EDWARD EPSTEIN**
130 East 75th Street
New York, NY 10021

**DARREN K. INDYKE, in his capacity as a co-executor
of the ESTATE OF JEFFREY EDWARD EPSTEIN**
6030 Le Lac Road
Boca Raton, FL 33496

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

-----X
**JANE DOE I, JANE DOE II, JANE DOE III, JANE
DOE IV, JANE DOE V, JANE DOE VI, JANE DOE
VII, JANE DOE VIII and JANE DOE IX,**

Index No.: _____/19

Plaintiffs,

-against -

**VERIFIED
COMPLAINT**

**DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the ESTATE OF
JEFFREY EDWARD EPSTEIN,**

Defendants.

-----X
COMPLAINT AND JURY TRIAL DEMANDED

Plaintiffs **JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV, JANE DOE
V, JANE DOE VI, JANE DOE VII, JANE DOE VIII and JANE DOE IX**, by and through
their counsel at **MERSON LAW, PLLC**, and as for their complaint in this action against
defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the
executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, hereby allege the following:

NATURE OF THE CLAIMS

1. Jeffrey Edward Epstein (hereinafter, "Epstein") sexually abused, assaulted and battered many women and children, including the plaintiffs herein.
2. These nine women come forward to stand up for themselves and others, after they were sexually abused and assaulted by Epstein.
3. Some of these women were raped by Epstein, repeatedly.
4. All of these women were sexually battered, assaulted, and abused by Epstein as a part of the same conduct, occurrence, plan, scheme and transaction that was perpetrated,

conducted, organized and/or performed in New York City, Palm Beach, Florida, New Mexico, the U.S. Virgin Islands and other places by Epstein and his associates.

5. Epstein orchestrated a massive sex trafficking network to obtain hundreds of girls for himself for sexual gratification, and additionally lent these girls out to other wealthy and/or powerful individuals within his network to be sexually abused.

6. As expressed by United States District Judge Kenneth Marra in his opinion in *Doe I. v. United States*, “From between 1999 and 2007, Jeffrey Epstein abused more than thirty minor girls... at his mansion in Palm Beach, Florida, and elsewhere in the United States and overseas... In addition to his own sexual abuse of the victims, Epstein directed other persons to abuse the girls sexually... Epstein worked in concert with others to obtain minors not only for his own sexual gratification, but also for the sexual gratification of others.” (*Doe I. v. United States*, 359 F. Supp. 3d 1201, 1204)

7. Epstein committed sexual assault, sexual battery, intentional infliction of emotional distress and negligent infliction of emotional distress pursuant to New York common law.

VENUE, JURISDICTION AND TIMELINESS

8. The Estate of Jeffrey Epstein, which is being presided over by defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the estate of **JEFFREY EDWARD EPSTEIN**, includes a residence in New York, New York, that was occupied by Jeffrey Epstein before his death earlier this year.

9. On information and belief, this Court has personal jurisdiction over the Estate of Jeffrey Epstein pursuant to New York Civil Practice Law and Rules (“C.P.L.R.”) Sections 301 and 302 because defendant **RICHARD D. KAHN** is a resident of New York, plaintiffs reside in

New York and other States, defendants operate in New York, transact business in New York, and own, use or possess real property within New York and many of the acts of sexual abuse and as part of this nefarious plan and course of conduct perpetrated by Epstein occurred in New York, New York.

10. This action has been timely filed pursuant to the Child Victims Act (CPLR § 214-g). The actions described herein constitute sexual offenses by Epstein under New York Penal Law Article 130, and were committed against several of the named plaintiffs when they were children less than eighteen years of age, for which they suffered physical, psychological and other injuries as a result.

11. This action has also been timely filed pursuant to CPLR § 215(8)(a) which provides that a plaintiff shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against Epstein with respect to the same sex trafficking enterprise and sexual conduct, including sex with minors and by force, from which plaintiffs' claims arise, was terminated on August 29, 2019.

12. Any statute of limitations applicable to plaintiffs' claims, if any, is tolled due to the continuous and active deception, duress, fraud, threats of retaliation and other forms of misconduct that Epstein and his co-conspirators used to silence his many victims, including plaintiffs. Epstein's actions deprived plaintiffs of their opportunity to commence this lawsuit before his death.

13. Defendants are equitably estopped from asserting a statute of limitations defense. Allowing defendants to do so would be unjust. Epstein and his employees intimidated each of his victims into silence by threatening their lives and their livelihoods. Epstein and his employees

therefore prevented plaintiffs from commencing this lawsuit before his death. By using threats in accompaniment with his wealth and power, Epstein was able to escape punishment for his intolerable and brutal crimes against countless young women and underage girls, including plaintiffs, for the duration of his life.

14. The plaintiffs intend to take full discovery of the Estate of Jeffrey Epstein and all associates, family members and friends to determine who knew what and when.

15. At all material times herein mentioned, Epstein, and his associates, operated, transacted business, owned, used, maintained and/or possessed real and other property, equipment and apparatus within New York City, which he utilized as the base of his operations for his sexual exploitation of minor girls and women, including plaintiffs herein.

PARTIES

16. Several of the named plaintiffs, victims of sex trafficking and sexual abuse, have been identified by pseudonym because this matter is of a highly sensitive and personal nature, and public disclosure of their identities may subject them to further humiliation, shame, and emotional distress.¹

17. Plaintiffs are all United States citizens, domiciled in New York and several other States.

18. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and

¹ Plaintiffs use a pseudonyms because they are victims of sex crimes pursuant to N.Y. Civ. Rights § 50-b and other statutory and common law principles.

responsibilities. On information and belief, the Estate of Jeffrey Epstein maintained multiple properties in the United States, including, but not limited to, New York, New York and Palm Beach, Florida.

19. Defendant Darren K. Indyke is sued in his capacity as appointed executor of the Estate of Jeffrey Edward Epstein.

20. Defendant Richard D. Kahn is sued in his capacity as appointed executor of the Estate of Jeffrey Edward Epstein.

FACTS OF THE CASE

21. Starting in or about 1990 and continuing for a period of time thereafter, when plaintiff Jane Doe I was approximately fourteen-years-old, Epstein and his associates repeatedly sexually assaulted, abused, battered and raped her.

22. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe I suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

23. Starting in or about 1985, when plaintiff Jane Doe II was twenty-three-years-old, Epstein sexually assaulted, abused, and battered her.

24. As a result of the aforementioned sexual assault, abuse and battery, plaintiff Jane Doe II suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

25. Starting in or about 2003 and continuing for a period of time thereafter, when plaintiff Jane Doe III was approximately thirteen-years-old, Epstein and his associates repeatedly sexually assaulted, abused, battered and raped her.

26. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe III suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

27. Starting in or about 2001 and continuing for a period of time thereafter, when plaintiff Jane Doe IV was approximately fifteen-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

28. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe IV suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

29. Starting in or about 2004 and continuing for a period of time thereafter, when plaintiff Jane Doe V was nineteen-years-old, Epstein sexually assaulted, abused, battered and forced her to perform oral sex on him.

30. As a result of the aforementioned sexual assault, abuse, battery and forced oral sex, plaintiff Jane Doe V suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

31. Starting in or about 2001 and continuing for a period of time thereafter, when plaintiff Jane Doe VI was nineteen-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

32. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe VI suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

33. Starting in or about 2007 and continuing for a period of time thereafter, when plaintiff Jane Doe VII was twenty-one-years-old, Epstein and his associates sexually assaulted, abused, and battered her.

34. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe VII suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

35. Starting in or about 2000 and continuing for a period of time thereafter, when plaintiff Jane Doe VIII was twenty-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

36. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe VIII suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

37. Starting in or about 2002 and continuing for a period of time thereafter, when plaintiff Jane Doe IX was twenty-two-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

38. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe IX suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

**AS AND FOR A FIRST CAUSE OF ACTION FOR
BATTERY OF JANE DOE I AS TO JEFFREY EDWARD EPSTEIN**

39. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 38., inclusive, with the same force and effect as if hereafter set forth at length.

40. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

41. In or about 1990 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe I on several occasions when she was a minor child.

42. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

43. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

44. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and Plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

45. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

46. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

47. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SECOND CAUSE OF ACTION FOR
ASSAULT OF JANE DOE I AS TO JEFFREY EDWARD EPSTEIN**

48. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 47., inclusive, with the same force and effect as if hereafter set forth at length.

49. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

50. Epstein's predatory, sexual and unlawful acts against plaintiff, created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

51. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

52. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

53. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

54. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

55. This action falls within the exceptions to Article 16 of the C.P.L.R

**AS AND FOR A THIRD CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE I AS TO JEFFREY EDWARD EPSTEIN**

56. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 55., inclusive, with the same force and effect as if hereafter set forth at length.

57. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

58. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

59. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

60. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

61. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

62. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

63. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 62., inclusive, with the same force and effect as if hereafter set forth at length.

64. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

65. In or about 1985, Jeffrey Edward Epstein sexually abused plaintiff when she was twenty-three-years-old.

66. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

67. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional

and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

68. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

69. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

70. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

71. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

72. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 71., inclusive, with the same force and effect as if hereafter set forth at length.

73. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

74. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

75. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

76. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

77. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

78. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

79. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

80. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 79., inclusive, with the same force and effect as if hereafter set forth at length.

81. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

82. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

83. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

84. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

85. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

86. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS FOR A SEVENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

87. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 86., inclusive, with the same force and effect as if hereafter set forth at length.

88. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

89. In or about 2003, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe III when she was a minor child.

90. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

91. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

92. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

93. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

94. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

95. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN EIGHTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

96. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 95., inclusive, with the same force and effect as if hereafter set forth at length.

97. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

98. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

99. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

100. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

101. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

102. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

103. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A NINTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

104. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 103., inclusive, with the same force and effect as if hereafter set forth at length.

105. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

106. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

107. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

108. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

109. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

110. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

111. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 110., inclusive, with the same force and effect as if hereafter set forth at length.

112. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

113. In or about 2001, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe IV when she was a minor child.

114. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

115. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

116. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

117. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

118. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

119. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN ELEVENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

120. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 119., inclusive, with the same force and effect as if hereafter set forth at length.

121. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

122. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

123. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

124. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

125. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

126. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

127. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWELTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

128. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 127., inclusive, with the same force and effect as if hereafter set forth at length.

129. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

130. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

131. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

132. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

133. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

134. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A THIRTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

135. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 134., inclusive, with the same force and effect as if hereafter set forth at length.

136. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

137. In or about 2004, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe V when she was nineteen-years-old.

138. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

139. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

140. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

141. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

142. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

143. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTEENTH CAUSE OF ACTION FOR ASSAULT
OF JANE DOE V AS TO DEFENDANT JEFFREY EDWARD EPSTEIN**

144. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 143., inclusive, with the same force and effect as if hereafter set forth at length.

145. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

146. Epstein's predatory, sexual and unlawful acts against plaintiff, created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

147. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

148. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

149. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

150. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

151. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTEENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

152. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 151., inclusive, with the same force and effect as if hereafter set forth at length.

153. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

154. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

155. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

156. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

157. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

158. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

159. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 158., inclusive, with the same force and effect as if hereafter set forth at length.

160. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

161. In or about 2001 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VI when she was approximately nineteen-years-old.

162. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

163. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

164. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

165. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

166. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

167. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SEVENTEENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

168. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 167., inclusive, with the same force and effect as if hereafter set forth at length.

169. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

170. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

171. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

172. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

173. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

174. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

175. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN EIGHTEENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

176. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 175., inclusive, with the same force and effect as if hereafter set forth at length.

177. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

178. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

179. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

180. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

181. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

182. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A NINETEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE VII AS TO JEFFREY EDWARD EPSTEIN**

183. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 182., inclusive, with the same force and effect as if hereafter set forth at length.

184. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,** act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

185. In or about 2007 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VII when she was approximately twenty-one-years-old.

186. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

187. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

188. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

189. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

190. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

191. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTIETH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VII AS TO JEFFREY EDWARD EPSTEIN**

192. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 191., inclusive, with the same force and effect as if hereafter set forth at length.

193. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

194. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

195. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

196. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

197. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

198. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

199. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FIRST CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VII AS TO JEFFREY EDWARD EPSTEIN**

200. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 199., inclusive, with the same force and effect as if hereafter set forth at length.

201. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

202. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

203. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

204. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

205. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

206. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SECOND CAUSE OF ACTION FOR
BATTERY OF JANE DOE VIII AS TO JEFFREY EDWARD EPSTEIN**

207. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 206., inclusive, with the same force and effect as if hereafter set forth at length.

208. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

209. In or about 2000 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VIII when she was approximately twenty-years-old.

210. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

211. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

212. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and Plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

213. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

214. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

215. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-THIRD CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VIII AS TO JEFFREY EDWARD EPSTEIN**

216. Plaintiff's repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 215., inclusive, with the same force and effect as if hereafter set forth at length.

217. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

218. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

219. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

220. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

221. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

222. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

223. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FOURTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VIII AS TO JEFFREY EDWARD EPSTEIN**

224. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 223., inclusive, with the same force and effect as if hereafter set forth at length.

225. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

226. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, Plaintiff to suffer severe emotional distress.

227. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

228. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

229. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

230. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FIFTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

231. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 230., inclusive, with the same force and effect as if hereafter set forth at length.

232. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

233. In or about 2002 and continuing thereafter, Jeffrey Edward Epstein sexually abused Plaintiff Jane Doe IX when she was approximately twenty-two-years-old.

234. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

235. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

236. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

237. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

238. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

239. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SIXTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

240. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 239., inclusive, with the same force and effect as if hereafter set forth at length.

241. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

242. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

243. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

244. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

245. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

246. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

247. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SEVENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

248. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 247., inclusive, with the same force and effect as if hereafter set forth at length.

249. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

250. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

251. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

252. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling Plaintiff to recover punitive damages in amounts to be proven at trial.

253. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

254. This action falls within the exceptions to Article 16 of the C.P.L.R.

WHEREFORE, plaintiffs demand judgement against defendants in such sum as a jury would find fair, adequate and just containing the following relief:

- A. A declaratory judgement that the actions, conduct and practices of defendants complained of herein violated the laws of the State of New York;
- B. An injunction and order permanently restraining defendants from engaging in such unlawful conduct;
- C. An award of damages in an amount to be determined at trial, plus prejudgment interest, to compensate plaintiffs for all monetary and/or economic harm; harm to their personal and professional reputations and loss of career fulfillment; for all non-monetary and/or compensatory harm, including but not limited to, compensation for physical anguish and mental

anguish; all other monetary and/or non-monetary losses suffered by plaintiffs; and that by reason of the foregoing, plaintiffs sustained damages in a sum, pursuant to C.P.L.R. §3017, which exceeds the jurisdictional limits of all lower courts;

- D. An award of punitive damages;
- E. An award of costs that plaintiffs have incurred in this action, as well as plaintiffs' reasonable attorney's fees to the fullest extent permitted by law; and.
- F. Such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: Jordan Merson
Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,

Index No.: _____/19

Plaintiffs,

-against -

**ATTORNEY
VERIFICATION**

**DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,**

Defendants.

-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of
New York State, and a member of the firm **MERSON LAW, PLLC**, attorneys for the
plaintiffs in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same
is true to his own knowledge, except as to the matters therein stated to be alleged upon
information and belief, and that as to those matters he believes it to be true;

That the sources of his information and knowledge are investigations and records in the
file; and,

That the reason this verification is made by affirmant and not by the plaintiffs is that the
plaintiff are not within the County where the attorney has his office.

Dated: New York, New York
December 3, 2019



JORDAN K. MERSON

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV,
JANE DOE V, JANE DOE VI, JANE DOE VII, JANE DOE VIII
and JANE DOE IX,

Plaintiffs,

- against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

Defendants.

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC

Attorneys for Plaintiffs

Office and P.O. Address, Telephone

150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

To: All Parties

EXHIBIT

2

EXHIBIT

3



STATE OF NEW YORK
UNIFIED COURT SYSTEM
111 CENTRE STREET
NEW YORK, N.Y. 10013
(646) 386-4200

LAWRENCE K. MARKS
Chief Administrative Judge

GEORGE J. SILVER
Deputy Chief Administrative Judge
New York City Courts

ADMINISTRATIVE ORDER #371
AMENDED

By the authority vested in me as Deputy Chief Administrative Judge of the courts within New York City, and as the coordinating judge of all cases filed under the Child Victims Act¹ (the "CVA") within that jurisdiction, I hereby order as follows:

1. This Order applies to all cases filed or hereafter filed in the Supreme Courts in and for the counties of Bronx, Kings, New York, Queens, and Richmond pursuant to the CVA, including any such matters filed before the one-year window commenced on August 14, 2019, and which were then stayed pending the opening of the window on August 14, 2019.
2. While a steering committee negotiates a Case Management Order to address the efficient prosecution and defense of cases filed under the CVA, all Preliminary Conferences currently scheduled or requested as of the effective date of this Order, and any requests for Preliminary Conferences made after the effective date of this Order are adjourned to a control date of January 31, 2020.²
3. The time to respond to any discovery demands served by the parties as of the effective date of this Order is adjourned without a date. No demands for discovery shall be served by any party until further Order of this Court.
4. Plaintiffs' time to respond to stipulations and orders that consent to or direct the production of identifying information, consisting of a plaintiff's name (including maiden name, if any), date of birth, social security number, parents and/or guardian's names, current address, and address at the time of the alleged abuse, for plaintiffs proceeding under pseudonyms is extended to December 20, 2019. Plaintiffs shall provide such identifying information to

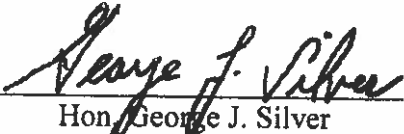
¹ L. 2019 c.11.

² Parties may make an application to extend this, and other deadlines, as necessary.

defense counsel in a manner other than disclosure in a public filing on NYSCEF and as agreed to by the parties. Nothing in this Order prevents plaintiffs from voluntarily providing such identifying information at any time.

5. All papers in opposition to any Order to Show Cause or Notice of Motion, including motions to dismiss under CPLR §3211 or §3212, but excluding motions to proceed anonymously or by pseudonym, are adjourned until January 31, 2020. Should the motion(s) not be resolved and withdrawn by the parties as of that date, the Court will set any additional due dates as necessary. No motions, other than motions to proceed anonymously or by pseudonym, shall be filed prior to January 31, 2020 without permission of the Court. As such, no motions to dismiss under CPLR §3211 or §3212 shall be filed prior to January 31, 2020.
6. The time to answer, move against, or otherwise respond to any complaint that has been served as of the effective date of this Order is extended until further Order of the Court. This Order supersedes any due dates for answers or motions previously stipulated to by the parties and/or ordered by this Court.
7. The time to answer, move against, or otherwise respond to any complaint that is served after the effective date of this Order, but prior to January 31, 2020, shall be extended until a date stipulated to by the parties or as directed by further Order of the Court.
8. Notwithstanding any stipulation or Court Order to the contrary, no motion to sever shall be filed prior to January 31, 2020. Consistent with the CPLR, motions to sever may be filed after January 31, 2020.
9. Counsel shall make a good faith effort to resolve any motions to dismiss or motions to sever prior to filing such motions.

Dated: December 11, 2019



Hon. George J. Silver
Deputy Chief Administrative Judge
New York City Courts

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X
JANE DOE I, *et al.*,

Plaintiffs.

- against -

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the ESTATE OF
JEFFREY EDWARD EPSTEIN,

Defendants.
----- X

:
:
: Index No. 950230/2019

:
: Hon. George J. Silver

:
: **STIPULATION AND**
: **[PROPOSED] ORDER**
: **ON PLAINTIFFS'**
: **ANONYMITY**

:
: (Motion Seq. 001)

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys, that any person subject to this Order, including the parties to this action and their respective counsel of record, shall adhere to the following terms:

1. Within three (3) days of entry of this Order, Counsel of Record for Plaintiffs shall disclose Plaintiffs' identities to Counsel of Record for Defendants, in writing.
2. Counsel of Record for Defendants may disclose Plaintiffs' identities only to Defendants and any attorneys, paralegals, and clerical or other assistants working with or for Defendants on matters related to this action; and the recipients of such information shall not disclose it to any other persons.
3. If Defendants wish to disclose Plaintiffs' identities to any person not otherwise permitted to receive such information under this Order, Defendants are limited to doing so in connection with defending this action, and must require such person to first execute a non-disclosure agreement, in a form agreed to by the parties, that prevents such person from disclosing Plaintiffs' identities to any other persons. Defendants must maintain a list of all such persons to whom Plaintiffs' identities are disclosed and copies of the executed non-disclosure agreements, all of which are subject to *in camera* inspection.
4. All portions of pleadings, motions or other papers filed with the Court that disclose Plaintiffs' identities shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. All parties shall use their best efforts to minimize such sealing. Any party filing a motion or any other papers with the Court under seal

shall also publicly file a redacted copy of the same, via NYSCEF, that redacts the Plaintiffs' identities and text that would reveal Plaintiffs' identities.

5. The parties may seek to modify or amend this Order at any time upon motion to the Court or by stipulation.
6. Motion Seq. 001 is resolved by entry of this Order; and the hearing on Motion Seq. 001 currently set for December 17, 2019 at 3:00 p.m. is canceled.

AND IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in counterparts; and facsimile signatures are deemed originals.

Dated: New York, New York
December 5, 2019

MERSON LAW, PLLC

TROUTMAN SANDERS LLP

By: Jordan Merson
Jordan K. Merson
150 East 58th Street, 34th Floor
New York, NY 10155
(212) 603-9100

Attorneys for Plaintiffs

By: Bennet J. Moskowitz / K.B.
Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
(212) 704-6000

*Attorneys for Defendants Darren K. Indyke and
Richard D. Kahn, Co-Executors of the Estate of Jeffrey
E. Epstein*

SO ORDERED.

Date: _____
New York, New York

HON. GEORGE J. SILVER, J.S.C.

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

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

Case No. ST-19-PB-80



Claim for Unliquidated and Unsecured Damages

COME NOW, Claimant Jane Doe I (“Claimant”), through her attorney Melody D. Westfall, Esq. of Westfall Law, PLLC, 5032 Anchor Way, Suite 8, Christiansted, St. Croix 00820, and hereby present and file this claim for unliquidated and unsecured damages from the estate in the above-referenced matter, and state as follows:

1. Prior to being arrested and brought into custody on July 6, 2019 by federal authorities in New York, the decedent, Jeffrey E. Epstein (the “Decedent”), was the subject of multiple on-going investigations into his criminal conduct including, but not limited to, his sex trafficking and sexual abuse of dozens of women, some of whom were underage. Claimant is one of those victims.

2. On information and belief, after his arrest, the decedent conspired with multiple individuals, including his attorneys and the two men named as the co-executors of his estate, to fraudulently convey and prevent the distribution of his assets to his numerous victims, including Claimant, in the event that they sought damages through civil recourse.

3. The deceased was able to do this by executing a Last Will and Testament on August 8, 2019, which included a newly formed pour-over trust known as The 1953 Trust (the “Trust”), just two days before his death by suicide on August 10, 2019. There is no doubt that these documents were set-up to defraud his creditors, including Ms. Claimant. A true and correct copy

of the decedent's Last Will and Testament is annexed hereto as Exhibit "1" and a true and correct copy of decedent's death certificate is attached hereto as Exhibit "2".

4. In decedent's petition for probate and letters testamentary, the value of personal property and total estate property is listed at \$577,672,654.00. See Exhibit 1.

5. On December 3, 2019, Claimant and eight of her fellow survivors filed a civil action in the Supreme Court of the State of New York, County of New York (New York County Index No.: 950230/2019) seeking damages against the decedent's estate. A true and correct copy of the Summons and Verified Complaint is annexed hereto as Exhibit "3".

6. Because Claimant was a minor when she was abused by the deceased, her claim was brought timely pursuant to New York's recently enacted Child Victims Act and NY CPLR § 214-g.

7. Furthermore, Claimant's claim is also timely pursuant to NY CPLR § 215(8)(a) which provides that a claimant shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against the deceased with respect to the same sex trafficking enterprise and sexual conduct from which Claimant's claim arises, was terminated less than a year ago on August 29, 2019.

8. Specifically, starting in or about 1990 and continuing for a period of time thereafter, when Claimant was approximately fourteen years old, Epstein and his associates repeatedly sexually assaulted, abused, battered and raped her, which caused severe and serious injuries.

9. As such, Claimant, by and through the above-referenced claim, has a right to money damages, whether it is in the form of a judgment or liquidated, fixed or matured damages, and therefore, has an equitable lien on all unencumbered assets and property of the decedent's estate.

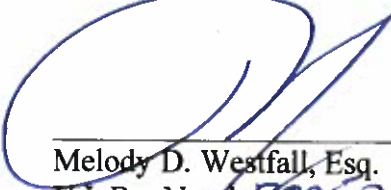
10. Accordingly, Claimant's claim requires that this Court not only secure sufficient assets from the estate to pay her for whatever damages and losses she may be deemed entitled to for which further information can be provided upon request, but also prevent the sale, transfer or waste of any assets or property that are part of the decedent's estate.

WHEREFORE, Claimant prays that the Court (a) enter judgment against decedent's estate in an amount sufficient to satisfy her Final Judgment in all pending matters, along with interest, attorneys' fees and punitive damages related to the decedent's fraudulent scheme and activities; (b) or in the alternative, stay all further proceedings in this matter pending the disposition of Claimant's New York lawsuit against the Estate; and, (c) all other further relief as this Court may deem just and proper.

This Claim is verified by counsel, pursuant to 15 V.I.C. § 393 and 5 V.I.C. § 699, as it is sworn under penalties of perjury that the contents hereof are true and correct to the best of the undersigned counsel's knowledge, information and belief.

Dated: Christiansted, St. Croix
January 31, 2020

Respectfully Submitted,



Melody D. Westfall, Esq.
V.I. Bar Number 72052
WESTFALL LAW PLLC
5032 Anchor Way, Suite 8
Christiansted, St. Croix 00820
mwestfall@westfalllaw.com
(340) 227-0017
Attorneys for Claimant Jane Doe I

CERTIFICATE OF SERVICE

I hereby certify that on January 31st, 2020, I caused a true and correct copy of the foregoing

Claim for Unliquidated and Unsecured Damages to be served on the following:

William Blum, Esq.
KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Darren K. Indyke, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Richard Kahn, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Douglas B. Chanco, Esq.
CHANCO SCHIFFER LAW, LLC
9053 Sugar Estate, Suite 103
St. Thomas, USVI 00802

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Robert V. Goldsmith III, Esq.
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St. Thomas, USVI 00802

Richard P. Bourne-Vanneck, Esq.
RICHARD P. BOURNE-VANNECK, P.C. d/b/a
LAW OFFICES OF RICHARD P. BOURNE-VANNECK
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CUTI HECKER WANG LLP
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New York, NY 10007

Gloria Allred, Esq.
ALLRED, MAROKO & GOLDBERG
305 Broadway, Suite 607
New York, NY 10007

John H. Benham, Esq.
LAW OFFICE OF JOHN H. BENHAM, P.C.
9800 Buccaneer Mall Building 2, Suite 9
P.O. Box 11720
St. Thomas, USVI 00801

EXHIBIT

1

LAST WILL AND TESTAMENT

OF

JEFFREY E. EPSTEIN

I, JEFFREY E. EPSTEIN, a resident and domiciliary of St. Thomas, United States Virgin Islands, do make, publish and declare this to be my Will hereby revoking all prior Wills and Codicils made by me.

1: I direct my Executor to pay from my estate all expenses of my last illness, my funeral and burial expenses, the administration expenses of my estate and all of my debts duly proven and allowed against my estate.

A. I direct my Executor to pay from my estate, as compensation to each Executor for serving as Executor hereunder, the sum of Two Hundred Fifty Thousand Dollars (\$250,000) to each Executor upon the completion of probate of my estate. No Executor shall receive any other compensation for serving as Executor hereunder; provided, however, that my Executor shall be reimbursed from my estate for all reasonable costs, expenses, charges, and liabilities incurred or paid in respect thereto, including fees and expenses of counsel or any other agents hired by my Executor, and my Executor shall not be liable therefor individually.

B. I direct my Executor to pay from my estate the federal and state transfer taxes described in Paragraph B(1) of Article SEVENTH.

C. I direct my Executor to pay from my estate all expenses of storing, insuring, packing, shipping and delivering my tangible personal property in accordance with the provisions of Article SECOND.

2: I give all of my property, real and personal, wherever situated, after the payments and distributions provided in Article FIRST, to the then acting Trustees of The 1953 Trust ("Trust") created under that certain Trust Agreement of The 1953 Trust (the "Trust Agreement") dated August 8, 2019, as the same may be amended from time to time, to be held in accordance with the provisions comprising the Trust Agreement at the time of my death.

3: I appoint DARREN K. INDYKE and RICHARD D. KAHN to serve as the Executors of this Will. If any one or more of my Executors fails to qualify, is unable or unwilling to serve or ceases to act, I appoint BORIS NIKOLIC, as successor Executor. If any successor Executor fails to qualify, is unable or unwilling to serve or ceases to act, I authorize the last acting Executor to designate his or her successor. Such designation shall be made by written instrument delivered to such designated successor Executor.

A. If my estate must be administered in whole or in part in any jurisdiction other than the state or territory of my domicile at the date of my death, and if my Executor is unable or unwilling to serve in such jurisdiction, then I appoint the successor Executor of my estate designated in Paragraph A of Article THIRD as successor Executor in such



jurisdiction only, provided that he or she is able and willing to serve in such jurisdiction. If no Executor or successor Executor is able and willing to serve in such jurisdiction, my Executor shall designate a successor Executor to serve in such jurisdiction. Such designation shall be made by written instrument delivered to such successor Executor.

B. No bond or other security shall be required of any Executor in any jurisdiction.

C. Any Executor may resign in the manner provided for by the governing statutes of the state or territory having jurisdiction of the administration of my estate or in the absence of such statutory guidance, by filing a written notice of resignation with the Court having jurisdiction of the administration of my estate. Any Executor who resigns shall not be entitled to any compensation hereunder for any services rendered as Executor prior to his or her resignation.

D. My Executor shall not be accountable or responsible to any person interested in my estate for the manner in which my Executor in good faith exercises or declines to exercise any discretionary authority or power of my Executor. My Executor shall not be liable for any loss or depreciation in value occasioned by reason of any negligence, error or mistake of judgment in entering into any transaction, in making any sale or investment, in continuing to hold any property or by reason of any action or omission, whether by my Executor or any other fiduciary, unless my Executor has acted in bad faith. In the absence of proof by affirmative evidence to the contrary, each Executor shall be deemed to have acted within the scope of my Executor's authority, to have exercised reasonable care, diligence and prudence and to have acted impartially as to all interested persons. An Executor shall not be liable for the acts or defaults of another Executor.

4: The following provisions shall apply to my estate and to my Executor, except as is otherwise specifically provided in this Will:

A. My Executor has the entire care and custody of all assets of my estate. My Executor has the power to do everything my Executor in good faith deems advisable without necessity of any judicial authorization or approval, even though but for this power it would not be authorized or appropriate for fiduciaries under any statutory or other rule of law. My Executor shall exercise my Executor's best judgment and discretion for what my Executor believes to be in the best interests of the beneficiaries hereunder. Except as otherwise specifically provided in this Will, if two Executors are empowered to participate in the decision to exercise or not to exercise any fiduciary power granted by this Will or by law, such decision shall be made by such Executors acting unanimously. If more than two Executors are empowered to participate in the decision to exercise or not exercise any fiduciary power granted by this Will or by law, a majority of such Executors shall be empowered to make such decision.

B. Except as otherwise provided herein, my Executor shall have the power:

(1) to enter upon and take possession of the assets of my estate and collect the income and profits from such assets, and to invest and reinvest such assets in real, personal or mixed assets (including the common trust funds of a corporate

fiduciary) or in undivided interests therein without being limited by any present or future investment laws;

(2) to retain all or any part of the assets of my estate (without regard to the proportion that any one asset or class of assets may bear to the whole) in the form in which such assets were received or acquired by my Executor;

(3) to sell or dispose of, exchange, transfer, invest or loan all or any part of the assets of my estate which may, at any time, be held by my Executor for such sums or upon such terms as to payment, security or otherwise as my Executor determines, either by public or private transactions;

(4) to buy and sell options, warrants, puts, calls or other rights to purchase or sell (collectively "options") relating to any security or securities, regardless of whether such security or securities are then held by my Executor, and whether such options are purchased or sold on a national securities exchange, and to exercise with respect to such options all powers which an individual owner thereof could exercise, including, without limitation, the right to allow the same to expire;

(5) with respect to oil, natural gas, minerals, and all other natural resources and rights to and interests therein (together with all equipment pertaining thereto), including, without limiting the generality of the foregoing, oil and gas royalties, leases, or other oil and gas interests of any character, whether owned in fee, as lessee, lessor, licensee, concessionaire or otherwise, or alone or jointly with others as partner, joint tenant, or joint venture in any other noncorporate manner, (a) to make oil, gas and mineral leases or subleases; (b) to pay delay rentals, lease bonuses, royalties, overriding royalties, taxes, assessments, and all other charges; (c) to sell, lease, exchange, mortgage, pledge or otherwise hypothecate any or all of such rights and interests; (d) to surrender or abandon, with or without consideration, any or all of such rights and interests; (e) to make farm-out, pooling, and unitization agreements; (f) to make reservations or impose conditions on the transfer of any such rights or interests; (g) to employ the most advantageous business form in which properly to exploit such rights and interests, whether as corporations, partnerships, limited partnerships, mining partnerships, limited liability companies, joint ventures, co-tenancies, or otherwise exploit any and all such rights and interests; (h) to produce, process, sell or exchange all products recovered through the exploitation of such rights and interests, and to enter into contracts and agreements for or in respect of the installation or operation of absorption, reprocessing or other processing plants; (i) to carry any or all such interests in the name or names of a nominee or nominees; (j) to delegate, to the extent permitted by law, any or all of the powers set forth herein to the operator of such property; and (k) to employ personnel, rent office space, buy or lease office equipment, contract and pay for geological surveys and studies, procure appraisals, and generally to conduct and engage in any and all activities incident to the foregoing powers, with full power to borrow and pledge in order to finance such activities; together with the power to allocate between principal and income any net proceeds received as consideration, whether as royalties or otherwise, for the permanent severance from lands of oil, natural gas, minerals, and all other natural resources;

(6) to hold all or any part of the assets of my estate in cash or in bank accounts without the necessity of investing the same;

(7) to improve, repair, partition, plat or subdivide all or any part of the assets of my estate;

(8) to litigate, defend, compromise, settle, abandon or submit to arbitration on such terms and conditions as my Executor determines any claims in favor of or against my estate or the assets of my estate;

(9) to loan or borrow money in such amounts and upon such terms and conditions as my Executor determines, assume such obligations or give such guarantees as my Executor determines, for the purpose of the acquisition, improvement, protection, retention or preservation of the assets of my estate, or for the welfare of the beneficiaries of my estate;

(10) to carry on for as long and in such manner as my Executor determines any business enterprise in which I owned any interest at my death, either individually, or as a partner, member, joint venture, stockholder or trust beneficiary; to sell such business enterprise as an ongoing business; to consolidate, merge, encumber, dissolve, liquidate or undertake any other extraordinary corporate transaction relating to such business enterprise;

(11) to vote in person or by proxy any and all stock or securities and to become a party to any voting trusts, reorganization, consolidation or other capital or debt readjustment of any corporation, association, partnership, limited liability partnership, limited liability company or individual with respect to stocks, securities or debts held by my estate;

(12) except as provided for in Sections (20) and (21) of this Article Fourth, to enter into any good faith transactions with any Executor individually or with any corporation, partnership or other entity in which any Executor has an ownership interest;

(13) To purchase from my estate any stocks, bonds, securities, real or personal property, or other assets, or make loans to my estate even though the same person or persons occupy the office of my Trustee and the office of the Executor of my estate;

(14) to lease, mortgage, pledge, grant a security interest in or otherwise encumber all or any part of the assets of my estate for any term of years whether or not beyond the duration of my estate (including, without limitation, any such action for the benefit of any of the beneficiaries of my estate);

(15) to abandon any property of my estate, real or personal, which my Executor may deem worthless or not of sufficient value to warrant keeping or protecting; to abstain from the payment of taxes, water rents or assessments and to forego making repairs, maintaining or keeping up any such property; and to permit such property to be lost by tax sale or other proceedings or to convey any such property for a nominal consideration or without consideration so as to prevent the imposition of any liability by reason of the continued ownership thereof;

(16) to elect the mode of distribution of the proceeds payable to my estate from any profit-sharing plan, pension plan, employee benefit plan, individual retirement plan, insurance contract or annuity contract pursuant to the terms of such plan;

(17) to allocate, in my Executors discretion, any adjustment to basis provided to my estate under the provisions of Federal and State law with respect to property comprising my estate, without any obligation to make a compensatory adjustment among the beneficiaries hereunder on account of such allocation;

(18) to conduct any audit, assessment or investigation with respect to any asset of my estate regarding compliance with any law or regulation having as its object protection of public health, natural resources or the environment ("Environmental Laws"); to pay from the assets of my estate to remedy any failure to comply with any Environmental Law (even to the exhaustion of all of the assets of my estate); and, as may be required in my Executor's judgment by any Environmental Law, to notify any governmental authority of any past, present or future non-compliance with any Environmental Law; and

(19) to sell to the Trustee under the Trust Agreement any stocks, bonds, securities, real or personal property or other assets or borrow from the Trustee under the Trust Agreement even though the same person or persons occupy the office of the Executor of my estate and the Trustee under the Trust Agreement.

(20) No executor shall directly or indirectly buy or sell any property for the estate from or to himself, or from or to his relative, employer, employee, partner, or other business associate.

(21) No executor shall lend estate funds to himself, or to his relative, employer, employee, partner, or other business associate.

C. Except as otherwise provided herein, my Executor shall have the power:

(1) to employ agents, attorneys-at-law, consultants, investment advisers (to whom my Executor has discretion to delegate my Executor's investment authority and responsibility), other executors and other fiduciaries in the administration of my Executor's duties; to delegate to such persons, or to one or more of my Executors, the custody, control or management of any part of my estate as my Executor determines and to pay for such services from the assets of my estate, without obtaining judicial authorization or approval;

(2) to delegate, in whole or in part, to any person or persons the authority and power to (a) sign checks, drafts or orders for the payment or withdrawal of funds, securities and other assets from any bank, brokerage, custody or other account in which funds, securities or other assets of my estate shall be deposited, (b) endorse for sale, transfer or delivery, or sell, transfer or deliver, or purchase or otherwise acquire, any and all property, stocks, stock warrants, stock rights, options, bonds or other securities whatsoever, (c) gain access to any safe deposit box or boxes in which my assets or assets of my estate may be located or which may be in the name of my Executor and remove part or all of the contents of any such safe

deposit box or boxes and release and surrender the same, and (d) take any other action that my Executor may have the power to take with respect to my estate and the property thereof; no person or corporation acting in reliance on any such delegation shall be charged with notice of any revocation or change of such delegation unless such person or corporation receives actual notice thereof;

(3) to pay any property distributable to a beneficiary under a legal disability or who has not attained the age of 21, without liability to my Executor, by paying such property (a) to such beneficiary, (b) for the use of such beneficiary, (c) to a legal representative of such beneficiary appointed by a court or if none, to a relative for the use of such beneficiary, or (d) to a custodian for such beneficiary designated by my Executor, to hold until age 21 or such earlier age as shall be the maximum permitted under applicable law;

(4) to distribute to any of the beneficiaries of my estate in kind or in cash, or partly in kind and partly in cash, and to allocate different kinds or disproportionate shares of assets or undivided interests in assets among all of such beneficiaries;

(5) to have evidence of ownership of any security maintained in the records of a Federal Reserve Bank under the Federal Reserve Book Entry System; to deposit funds in any bank or trust company; to carry in the name of my Executor or the nominee or nominees of my Executor and with or without designation of fiduciary capacity, or to hold in bearer form, securities or other property requiring or permitting of registration; and to cause any securities to be held by a depository corporation of which an Executor is a member or by an agent under a safekeeping contract; provided, however, that the books and records of my Executor shall at all times show that such investments are part of my estate;

(6) to renounce and disclaim, in whole or in part, and in accordance with applicable law, any assets, interests, rights or powers (including any power of appointment) which are payable to (or exercisable by) me or my estate, which are includible in my estate or Gross Estate or over which I have any right, title, interest or power; and

(7) to make, execute and deliver any and all such instruments in writing as shall be necessary or proper to carry out any power, right, duty or obligation of my Executor or any disposition whatsoever of my estate or any asset of my estate and to exercise any and all other powers incidental or necessary to carry out or to fulfill the terms, provisions and purposes of my estate.

D. In connection with any insurance policy or annuity on the life of an Executor which is included in my estate, such Executor shall not participate in the decision to exercise or not exercise any fiduciary power in connection with any incidents of ownership for such policy or annuity, including, without limitation, any decision to continue, assign, terminate or convert such policy or annuity or to name the beneficiary of such policy or annuity.

E. An Executor hereunder may by a written notice delivered to the other Executor decline to participate in the decision to exercise or not exercise any fiduciary power granted by this Will or by law.

F. If an Executor is not empowered (because of a conflict of

interest, declination to act or otherwise) to participate in the decision to exercise or not exercise any fiduciary power granted by this Will or by law, then the remaining Executor shall be empowered to make such decision. If no Executor is empowered to participate in such decision, then the successor Executor of my estate designated in Paragraph A of Article THIRD and able and willing to act shall be empowered to make such decision. If no Executor or successor Executor is empowered to participate in such decision, my Executor may designate a successor Executor to serve as Executor of my estate who shall be empowered to make such decision but shall have no other power or authority of my Executor. Such designation shall be by written notice delivered to such successor Executor.

G. Except as otherwise specifically provided in this Paragraph G(1) of this Article, and except as provided in Paragraph G(2) of this Article, my Executor shall allocate receipts and disbursements in accordance with sound trust accounting principles and shall have discretion to allocate receipts and disbursements when the treatment is uncertain under applicable laws or generally accepted accounting principles in the judgment of my Executor.

(1) Except as otherwise specifically provided in this Will, my Executor shall not treat any part of the principal amount of the proceeds of sale of any asset of my estate as income distributable to or for the benefit of any beneficiary entitled to distributions of income; provided, however, that my Executor shall treat a portion of any proceeds of sale of any financial instrument originally issued or acquired at a discount equal to the amount which (a) has previously been characterized as ordinary income for income tax purposes or (b) will be characterized as ordinary income for income tax purposes in the year of such sale, as income for trust accounting purposes.

5: Where a party to any proceeding with respect to my estate has the same interest as a person under a disability, it shall not be necessary to serve legal process on the person under a disability.

6: If any beneficiary under the Trust shall in any way directly or indirectly (a) contest or object to the probate of my Will or to the validity of any disposition or provision of my Will or of the Trust or (b) institute or prosecute, or be in any way directly or indirectly instrumental in the institution or prosecution of, any action, proceeding, contest, objection or claim for the purpose of setting aside or invalidating my Will or the Trust or any disposition therein or provision thereof, then I direct that (a) any and all provisions in the Trust for such beneficiary and his issue in any degree shall be null and void and (b) my estate, whether passing under my Will or the Trust or pursuant to the laws of intestacy, shall be disposed of as if such beneficiary and his issue in any degree had all failed to survive me.

7: A. As used herein:

(1) The term "Executor" of a person's estate means all persons or entities who occupy the office of executor, administrator, personal representative, or ancillary administrator while such persons or entities occupy such office, whether one or more persons or entities occupy such office at the same time or times, and includes any

successor or successors to that office. The term "Trustee" means all persons or entities who occupy the office of Trustee under the Trust Agreement while such persons or entities occupy such office, whether one or more persons or entities occupy the office of Trustee at the same time or times, and includes any successor Trustee or Trustees. A reference to a person's estate or probate estate means that person's estate which is subject to probate administration. A reference to a person's Will means such person's Last Will and Testament and any Codicil or Codicils thereto.

(2) The term "IRC section" means a section of the Internal Revenue Code of 1986, as amended, or the corresponding provision of any successor Internal Revenue law, as in effect as of the date of my death.

(3) A reference to any tax also includes any interest or penalties thereon. A reference to a person's "Gross Estate" means such person's gross estate as finally determined for purposes of computing such person's federal estate tax.

(4) Whenever the singular number is used, the same shall include the plural, and the masculine gender shall include the feminine and neuter genders.

B. The federal and state transfer taxes which my Executor shall be obligated to pay pursuant to Paragraph B of Article FIRST shall consist of all federal and state estate, inheritance, succession, and similar taxes (including any federal or state generation-skipping transfer tax) imposed upon my probate estate or by reason of my death in respect to all assets which pass under this Will or the Trust Agreement. Subject to Paragraph B(2) of this Article, all federal estate taxes with respect to assets not passing under this Will or the Trust Agreement (such assets are referred to as the "Apportionment Assets") and any applicable state estate taxes with respect to the Apportionment Assets shall be apportioned among all persons interested in the Apportionment Assets. My Executor shall make reasonable efforts to collect all federal estate taxes and state estate, inheritance, succession and similar taxes allocable to the Apportionment Assets from the recipients of the Apportionment Assets. Without changing the apportionment of taxes in this Paragraph B(1), my Executor has discretion, but is not required, to pay all or part of such taxes allocable to the Apportionment Assets. To the extent my Executor pays such taxes allocable to the Apportionment Assets, my Executor shall seek reimbursement for such taxes from the recipients of the Apportionment Assets. My Executor shall not be personally liable for any of such taxes if my Executor is unable, with reasonable efforts, to collect payment (or reimbursement) from any recipient of any Apportionment Assets for any or all of such taxes allocable to such assets.

(1) My Executor has discretion to direct the Trustee of the Trust Agreement to pay all or any portion of the taxes which my Executor is directed or obligated to pay pursuant to Paragraph B of Article FIRST and this Paragraph B pursuant to a written direction delivered to the Trustee under the Trust Agreement. Any taxes which my Executor directs the Trustee under the Trust Agreement to pay shall be allocated and paid from the trusts under the Trust Agreement as provided under the Trust Agreement.

C. Except as otherwise specifically provided in this Will, a bequest or devise to an individual who does not survive me shall lapse notwithstanding any law to the contrary.

D. To the extent that the distribution to the Trustee under the Trust Agreement pursuant to Article SECOND shall not be effective, I give all the rest of my property, real and personal, wherever situated, after the payments and distributions provided in Article FIRST, to the person or persons named as Trustee or Trustees under the Trust Agreement, be to held in trust under this Will in accordance with the provisions comprising the Trust Agreement at the time of my death, which provisions are incorporated in this Will by reference.

IN WITNESS WHEREOF, I have duly executed this Will this 8th day of August, 2019.



JEFFREY E. EPSTEIN

The foregoing instrument, consisting of eleven (11) pages, was signed in our presence by Jeffrey E. Epstein and was declared by him to be his last Will. We, at the request of and in the presence of Jeffrey E. Epstein and in the presence of each other, have subscribed our names below as witnesses. We declare that we are of sound mind and of the proper age to witness a will, that to the best of our knowledge the testator is of the age of majority, or is otherwise legally competent to make a will, and appears of sound mind and under no undue influence or constraint. Under penalty of perjury, we declare these statements are true and correct on this 8th day of August, 2019 at New York, New York.

Mariel A. Colón Miró residing at [REDACTED]
Mariel A. Colón Miró [REDACTED]

Gulnora Tali residing at [REDACTED]
GULNORA TALI [REDACTED]

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.

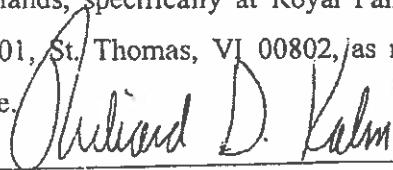
PROBATE NO. ST-19-PB-____

ACTION FOR TESTATE
ADMINISTRATION

OATH OF WILLINGNESS TO SERVE AS EXECUTOR AND
APPOINTMENT OF LOCAL COUNSEL

I, Richard D. Kahn, hereby declare, certify, verify, and state under penalty of perjury under the laws of the United States Virgin Islands that:

1. I am an adult of sound mind, have never been convicted of any felony or of a misdemeanor involving moral turpitude, and I am not a judicial officer.
2. I am a resident of New York, New York.
3. The Last Will and Testament of Jeffrey E. Epstein nominates and appoints me as an Executor of the Estate of Jeffrey E. Epstein, deceased.
4. I am willing to act as Executor of the above-captioned Estate according to the law and to the best of my ability and I will faithfully discharge the duties and obligations of Executor.
5. I will render a true accounting of all monies and property coming into my possession for which I am responsible.
6. I am willing to act as Executor of the above-captioned Estate and request that the Court act upon and grant all the prayers of the Petition for Probate.
7. I am a non-resident of the Virgin Islands, and thus, I appoint the law office of KELLERHALS FERGUSON KROBLIN PLLC, located in the Virgin Islands, specifically at Royal Palms Professional Building, 9053 Estate Thomas, Suite 101, St. Thomas, VI 00802, as my attorney upon whom service of all papers may be made.


Richard D. Kahn

SUBSCRIBED AND SWORN to before

me this 15th day of August, 2019.


NOTARY

MARIANNE BARNETT
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01BA6276845
Qualified in Suffolk County
Term expires February 25, 2021

19 AUG 15 PM 4:10

<u>PERSONAL PROPERTY²</u>	<u>VALUE</u>
Cash	\$ 56,547,773.00
Fixed Income Investments	\$ 14,304,679.00
Equities	\$ 112,679,138.00
Aviation Assets, Automobiles and Boats	\$ 18,551,700.00
Fine Arts, Antiques, Collectibles, Valuables & Other Personal Property	TBD subject to appraisal/valuation
Hedge Funds & Private Equity Investments	\$ 194,986,301.00
10,000 shares of Maple, Inc., a U.S. Virgin Islands corporation which holds title to 9 East 71 st Street New York, NY 10021	\$ 55,931,000.00
10,000 shares of Cypress, Inc., a U.S. Virgin Islands Corporation, which holds title to 49 Zorro Ranch Road Stanley, New Mexico 87056	\$ 17,246,208.00
10,000 shares of Laurel, Inc., a U.S. Virgin Islands Corporation, which holds title to 358 El Brillo Way Palm Beach, Florida 33480	\$ 12,380,209.00
999 shares of SCI JEP, a French Company which holds title to units 47 with mezzanine, 48 and 81 on the 2nd floor, units 63 and 74 on the 5 th floor and units 5 and 22 (cellars) in the basement 22 Avenue Foch Paris, France 75116	\$ 8,672,823.00
10,000 shares of Poplar, Inc., a U.S. Virgin Islands Corporation, which holds title to Great St. James Island No. 6A Red Hook Quarter St. Thomas, Virgin Islands	\$ 22,498,600.00
10,000 shares of Nautilus, Inc., a U.S. Virgin Islands Corporation, which holds title to Little St. James Island No. 6B Red Hook Quarter Parcels A, B & C St. Thomas, Virgin Islands	\$ 63,874,223.00
TOTAL PERSONAL PROPERTY:	\$ 577,672,654.00
TOTAL ESTATE PROPERTY:	\$ 577,672,654.00

² Values are subject to appraisal and/or update to their date of death valuation, which will be confirmed in verified inventory to be filed with the Court.

- 6) Petitioners are investigating potential debts and claims of the Estate and at this time they are unknown.
- 7) That the names and addresses, insofar as known to Petitioners, of the heirs and next of kin of the deceased, who would be entitled to share the estate if he had left no will; the relation of each such person to him; the proportion due each such person, and whether each of them is an adult or an infant are as follows:

<u>NAMES</u>	<u>RELATIONSHIP</u>	<u>CAPACITY</u>	<u>SHARE</u>
Mark Epstein	Brother	Adult	100%

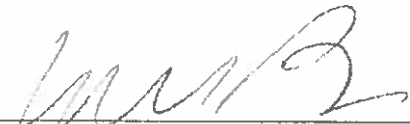
- 8) That Petitioners Darren K. Indyke and Richard D. Kahn be appointed Executors. They are adults of sound mind, are not convicted of any crime involving moral turpitude, and are not judicial officers of this Honorable Court.
- 9) Although Petitioners are not residents of the Virgin Islands, they are qualified to serve as Executors pursuant to 15 V.I.C. § 235(c) because they otherwise qualify under 15 V.I.C. § 235(a) and they have appointed the law firm of Kellerhals Ferguson Kroblin PLLC, which has offices on St. Thomas, Virgin Islands, to accept service of all papers for purposes of the probate of Decedent's estate.
- 10) The Decedent's Last Will and Testament provides that "No bond or other security shall be required of any Executor in any jurisdiction." See original Last Will and Testament attached hereto at Article THIRD, subsection B on page 2. Accordingly, Petitioners pray that the bond be waived pursuant to V.I. R. Prob. 3.

WHEREFORE, Petitioners pray:

- A. That the Estate of Jeffrey E. Epstein be entered into Probate;
- B. That a citation be issued to any heir or next of kin who has not signed a Waiver;
- C. That this Honorable Court order the issuance of a notice to creditors and claims procedure order in substantial form of that which will be separately proposed to the court forthwith;
- D. That the Last Will and Testament of Jeffrey E. Epstein, attached hereto, be admitted to Probate;
- E. That Darren K. Indyke and Richard D. Kahn be appointed Executors and Letters Testamentary be issued to them;
- F. That the bond be waived; and
- G. That the Petition be granted.

Respectfully,

DATED: August 15, 2019


WILLIAM BLUM, ESQ., Of Counsel
V.I. Bar No. 136
KELLERHALS FERGUSON KROBLIN PLLC
Royal Palms Professional Building
9053 Estate Thomas, Suite 101
St. Thomas, V.I. 00802-3602
Telephone: (340) 779-2564
Facsimile: (888) 316-9269
Email: wblum@solblum.com

VERIFICATION OF PETITION

I, Darren K. Indyke, Executor of the Last Will and Testament of Jeffrey E. Epstein, hereby verify I have read and do hereby certify that the statements contained in the Petition for Probate and for Letters Testamentary are accurate in so far as my knowledge and insofar as my own records show.

DATED: August 5, 2019

Darren K. Indyke
Darren K. Indyke

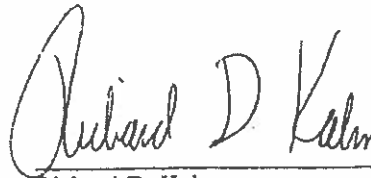
SUBSCRIBED AND SWORN to before me
this 5 day of August, 2019.



VERIFICATION OF PETITION

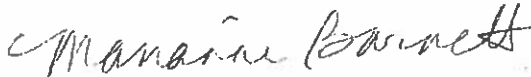
I, Richard D. Kahn, Executor of the Last Will and Testament of Jeffrey E. Epstein, hereby verify I have read and do hereby certify that the statements contained in the Petition for Probate and for Letters Testamentary are accurate in so far as my knowledge and insofar as my own records show.

DATED: August 15th, 2019



Richard D. Kahn

SUBSCRIBED AND SWORN to before me
this 15th day of August, 2019.



MARIANNE BARNETT
NOTARY PUBLIC, STATE OF NEW YORK
NO. 018A6276845
Qualified in Suffolk County
Term expires February 25, 2021

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

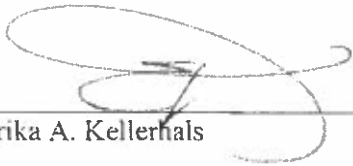
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IN THE MATTER OF THE ESTATE OF)
JEFFREY E. EPSTEIN)
)
Deceased.)
_____)

PROBATE NO. ST-19-PB-____
ACTION FOR TESTATE
ADMINISTRATION

AFFIDAVIT

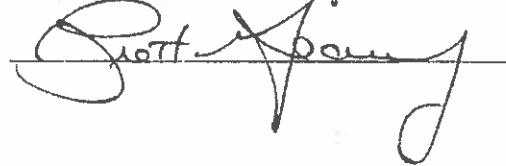
I, Erika A. Kellerhals, hereby depose or otherwise state that I do not know of any will or codicil of Jeffrey E. Epstein, deceased, other than the instrument in writing dated August 8, 2019; that I received the Last Will and Testament of Jeffrey E. Epstein from Jeffrey E. Epstein, and the said Jeffrey E. Epstein died on or about August 10, 2019.



Erika A. Kellerhals

SUBSCRIBED AND SWORN to before me

This 15th day of August, 2019.



Brett A. Geary
Notary Public: NP-144-15
Commission Expires: December 24, 2019
St. Thomas / St. John, USVI

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is crucial for ensuring transparency and accountability in the organization's operations.

2. The second part of the document outlines the various methods and tools used to collect and analyze data. It highlights the need for consistent data collection procedures and the use of advanced analytical techniques to derive meaningful insights from the data.

3. The third part of the document focuses on the role of technology in data management and analysis. It discusses how modern software solutions can streamline data collection, storage, and processing, thereby improving efficiency and accuracy.

4. The fourth part of the document addresses the challenges associated with data management, such as data quality, security, and privacy. It provides strategies to mitigate these risks and ensure that the data remains reliable and secure throughout its lifecycle.

5. The fifth part of the document concludes by summarizing the key findings and recommendations. It stresses the importance of a data-driven approach in decision-making and the need for continuous monitoring and improvement of the data management process.

THE CITY OF NEW YORK
VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK - DEPARTMENT OF HEALTH AND MENTAL HYGIENE
AUG-11-2019 07:36 PM CERTIFICATE OF DEATH Certificate No. 156-19-032838

19 AUG 15 2019
SUPERIOR COURT
FILED VITALS

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD EPSTEIN**
(First, Middle, Last)

Place of Death	2a. New York City	2c. Type of Place	4 <input type="checkbox"/> Nursing Home/Long Term Care Facility	2d. Any Hospice care in last 30 days	2e. Name of hospital or other facility (if not facility, street address)
	2b. Borough Manhattan	1 <input type="checkbox"/> Hospital Inpatient 2 <input type="checkbox"/> Emergency Dept./Outpatient 3 <input type="checkbox"/> Dead on Arrival	5 <input type="checkbox"/> Hospice Facility 6 <input type="checkbox"/> Decedent's Residence 7 <input type="checkbox"/> Other Specify	1 <input type="checkbox"/> Yes 2 <input type="checkbox"/> No 3 <input type="checkbox"/> Unknown	New York-Presbyterian-Lower Manhattan Hospital
Date and Time of Death or Found Dead	3a. (Month) August	(Day) 10	(Year-yyyy) 2019	3b. Time 7:36	4. Sex Male
5. C P A R T I	a. Immediate cause Pending Further Study				
	b. Due to or as a consequence of				
	c. Due to or as a consequence of				
PART II Other significant conditions contributing to death but not resulting in the underlying cause given in Part I. Include operation information.					
7a. Injury Date (mm dd yyyy)	7b. Time	7c. At Work	7d. Place of Injury - All homes, factories, streets, etc.		
---	<input type="checkbox"/> AM <input type="checkbox"/> PM	1 <input type="checkbox"/> Yes 2 <input type="checkbox"/> No	7e. Location		
7f. How Injury Occurred					
7g. If Transportation Injury Specify	8. Manner of Death	9. Autopsy	10. Check the box of cause of death and investigation. In my opinion, death occurred due to		
<input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify	<input checked="" type="checkbox"/> Pending further study <input type="checkbox"/> Natural <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Undetermined	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Autopsy Performed <input type="checkbox"/> No Autopsy	11. Cause and manner of death Heart Disease D.O. M.D. Date AUG-11-2019 KUNSTIN T. ROJMAN Medical Examiner		
11a. Usual Residence State	11b. County	11c. City or town	11d. Block or lot number	11e. ZIP Code	11f. Inside City Limits?
US Virgin Islands	St. Thomas	St. Thomas	Little Saint James Island	00802	1 <input type="checkbox"/> Yes 2 <input type="checkbox"/> No
12. Date of Birth (Month) (Day) (Year-yyyy)	13. Age at last birthday (years)	14. Social Security No.			
January 20 1953	66	3348			
15a. Usual Occupation (Type of work done during last of preceding 12 months unless stated)	15b. Kind of business or industry	15c. Industry of SICs			
Consultant	Finance	8800			
17. Birthplace (City & State or Foreign Country)	18. Education (Check the box that best describes the highest degree or level of education received at the time of death)				
Brooklyn, New York	1 <input type="checkbox"/> No schooling beyond high school 2 <input type="checkbox"/> High school graduate or GED 3 <input type="checkbox"/> Some college, but no degree 4 <input type="checkbox"/> Bachelor's degree (e.g., BA, BS) 5 <input type="checkbox"/> Master's degree (e.g., MA, MS) 6 <input type="checkbox"/> Doctoral degree (e.g., MD, DDS, DVM, LL.M., JD)				
19. Ever in U.S. Armed Forces?	20. Marital Status at time of death	21. Surviving Spouse's Name (Last name prior to first marriage) (First, Middle, Last)			
1 <input type="checkbox"/> Yes 2 <input type="checkbox"/> No	1 <input type="checkbox"/> Married 2 <input type="checkbox"/> Domestic Partnership 3 <input type="checkbox"/> Married, but separated 4 <input type="checkbox"/> Divorced 5 <input type="checkbox"/> Never Married 6 <input type="checkbox"/> Widowed 7 <input type="checkbox"/> Other, Specify	Paula Stolofsky			
22. Father's Name (First, Middle, Last)	23. Mother's Name (First, Middle, Last)				
Seymour Epstein	Paula Stolofsky				
24a. Informant's Name	24b. Relationship to Decedent	24c. Informant's Address (Street and Number) City & State ZIP Code			
Mark Epstein	Brother	1076 Madison Ave New York, NY 10028-0237			
25a. Method of Disposition	25b. Place of Disposition (Name of cemetery, crematory, other place)				
1 <input type="checkbox"/> Burial 2 <input type="checkbox"/> Cremation 3 <input type="checkbox"/> Entombment 4 <input type="checkbox"/> City Cemetery					
25c. Location of Disposition (City & State or Foreign Country)	25d. Date of Disposition (mm dd yyyy)				
	08 13 2019				
25e. Funeral Establishment	25f. Address (Street and Number) City & State ZIP Code				
	1076 Madison Ave New York, NY 10028-0237				

To be filed in by the OCME (to be filed in by Funeral Director or, in case of City Burial, by OCME)

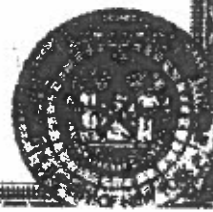
EVT201908377726

Bertha Van Wye
Gretchen Van Wye, Ph.D., City Registrar as of 8/1/18

August 11, 2019
Steven P. Schwartz
Steven P. Schwartz, Ph.D., City Registrar

This is to certify that the foregoing is a true copy of a record on file in the Department of Health and Mental Hygiene. The Department of Health and Mental Hygiene does not certify to the truth of the statements made thereon, as no inquiry as to the facts has been provided by law.
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EXHIBIT

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THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK -- DEPARTMENT OF HEALTH AND MENTAL HYGIENE

AUG-11-2019 07:36 PM

CERTIFICATE OF DEATH

Certificate No. 156-19-032838

19 AUG 15 10 PM '19
SUPERIOR COURT
THE VICE-CHIEF CLERK

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD EPSTEIN**
(First, Middle, Last)

1a. Place of Death Manhattan	2a. New York City Manhattan	3a. Type of Place <input type="checkbox"/> Hospital Inpatient <input checked="" type="checkbox"/> Emergency Dept./Outpatient <input type="checkbox"/> Dead on Arrival	4. Nursing Home/Long Term Care Facility <input type="checkbox"/> Hospital Facility <input type="checkbox"/> Decedent's Residence <input type="checkbox"/> Other Specify	5a. Any Hospice care in last 30 days <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown	5b. Name of hospital or other facility (if not facility, street address) New York-Presbyterian-Lower Manhattan Hospital
6. Date and Time of Death or Found Dead a. (Month) August (Day) 10 (Year-yyyy) 2019		7a. Time 7:36	7b. AM <input checked="" type="checkbox"/> PM <input type="checkbox"/>	8. Sex Male	9. OCME Case No. M19019432
10. Cause of Death a. Immediate cause Pending Further Study b. Due to or as a consequence of c. Due to or as a consequence of PART II Other significant conditions contributing to death but not resulting in the underlying cause given in Part I. Include operation information.					
11a. Injury Date (mm dd yyyy)		11b. Time	11c. At Work <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	11d. Place of Injury - All parts, sections, street, etc.	
12. How Injury Occurred					
13a. Transportation Injury Specify <input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify		13b. Manner of Death <input checked="" type="checkbox"/> Pending Autopsy <input type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Undetermined		13c. Autopsy <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Specify Purpose of Law) <input type="checkbox"/> No Autopsy	
14. For the basis of certification and/or identification, in my opinion, death occurred due to Cause of Death Leukemia D.O. M.D. Date AUG-11-2019 Medical Examiner KENNETH R. GILMAN (Chief Medical Examiner) Medical Examiner Robert Criss (Chief Medical Examiner)					
15a. Usual Residence State US Virgin Islands	15b. County St. Thomas	15c. City or Town St. Thomas	15d. Street or Highway St. John's Road	15e. ZIP Code 00802	15f. Is this City Listed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
16. Date of Birth (Month) (Day) (Year-yyyy) January 20 1943		16a. Age at last birthday (years) 66	16b. Social Security No. 3348		
17a. Usual Occupation (Type of work done during last 12 months) Consultant		17b. Kind of education or training B.S. Finance	17c. Degrees or AKA's		
18. Birthplace (City & State or Foreign Country) Brooklyn, New York		19. Education (Check the box that best describes the highest degree or level of professional degree at the time of death) <input type="checkbox"/> No graduate work done <input checked="" type="checkbox"/> High school diploma, but no degree <input type="checkbox"/> Bachelor's degree (e.g., BA, BS) <input type="checkbox"/> Master's degree (e.g., MA, MS) <input type="checkbox"/> Doctoral degree (e.g., MD, DDS, DVM, LL.M., JD)			
20. Ever in U.S. Armed Forces? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	21. Marital/Partnership Status at time of death <input checked="" type="checkbox"/> Married <input type="checkbox"/> Domestic Partnership <input type="checkbox"/> Divorced <input type="checkbox"/> Married, but separated <input type="checkbox"/> Never Married <input type="checkbox"/> Widowed <input type="checkbox"/> Other Specify		22. Spouse/Partner (Last name prior to first marriage) (First, Middle, Last) Paula Storofo		
23. Father's Name (First, Middle, Last) Seymour Epstein		24. Mother's Name (First, Middle, Last) Paula Storofo			
25a. Informant's Name Mark Epstein		25b. Relationship to Decedent Brother	25c. Address (Street and Number) [REDACTED]	25d. City & State [REDACTED]	25e. ZIP Code 33411-6219
26a. Method of Disposition <input type="checkbox"/> Burial <input checked="" type="checkbox"/> Cremation <input type="checkbox"/> Entombment <input type="checkbox"/> City Cemetery <input type="checkbox"/> Other Specify		26b. Place of Disposition (Name of cemetery, seaport, other place) [REDACTED]			
27a. Location of Disposition (City, State or Foreign Country) [REDACTED]		27b. Date of Disposition mm dd yyyy 08 13 2019	27c. Address (Street and Number) 1076 Madison Ave New York, NY 10028-0237		
28a. Funeral Establishment [REDACTED]		28b. Address (Street and Number) 1076 Madison Ave New York, NY 10028-0237			

To be filled in by the OCME

To be filled in by Funeral Director or, in case of City Burial, by OCME

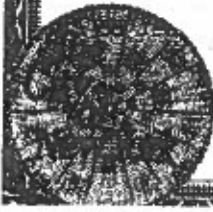
EVT201908377128

Stephen Van Wye
Gretchen Van Wye, Ph.D., City Registrar as of 8/1/18

August 11, 2019
Steven P. Schwartz
Steven P. Schwartz, Ph.D., City Registrar

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VI SUPERIOR COURT
CLERK'S OFFICE
ST CROIX DISTRICT

2020 JAN 31 PM 4:16

**AS FOR A SEVENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

87. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 86., inclusive, with the same force and effect as if hereafter set forth at length.

88. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

89. In or about 2003, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe III when she was a minor child.

90. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

91. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

92. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

93. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

94. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

95. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN EIGHTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

96. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 95., inclusive, with the same force and effect as if hereafter set forth at length.

97. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

98. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

99. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

100. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

101. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

102. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

103. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A NINTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

104. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 103., inclusive, with the same force and effect as if hereafter set forth at length.

105. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

106. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

107. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

108. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

109. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

110. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

111. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 110., inclusive, with the same force and effect as if hereafter set forth at length.

112. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

113. In or about 2001, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe IV when she was a minor child.

114. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

115. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

116. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

117. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

118. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

119. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN ELEVENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

120. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 119., inclusive, with the same force and effect as if hereafter set forth at length.

121. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

122. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

123. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

124. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

125. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

126. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

127. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWELTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

128. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated I. through 127., inclusive, with the same force and effect as if hereafter set forth at length.

129. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

130. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

131. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

132. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

133. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

134. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A THIRTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

135. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 134., inclusive, with the same force and effect as if hereafter set forth at length.

136. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

137. In or about 2004, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe V when she was nineteen-years-old.

138. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

139. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

140. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

141. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

142. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

143. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTEENTH CAUSE OF ACTION FOR ASSAULT
OF JANE DOE V AS TO DEFENDANT JEFFREY EDWARD EPSTEIN**

144. Plaintiffs repeat, reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 143., inclusive, with the same force and effect as if hereafter set forth at length.

145. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

146. Epstein's predatory, sexual and unlawful acts against plaintiff, created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

147. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

148. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

149. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

150. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

151. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTEENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

152. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1, through 151., inclusive, with the same force and effect as if hereafter set forth at length.

153. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

154. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

155. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

156. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

157. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

158. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

159. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 158., inclusive, with the same force and effect as if hereafter set forth at length.

160. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,** act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

161. In or about 2001 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VI when she was approximately nineteen-years-old.

162. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

163. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

164. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

165. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

166. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

167. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SEVENTEENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

168. Plaintiffs repeat, reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 167., inclusive, with the same force and effect as if hereafter set forth at length.

anguish; all other monetary and/or non-monetary losses suffered by plaintiffs; and that by reason of the foregoing, plaintiffs sustained damages in a sum, pursuant to C.P.L.R. §3017, which exceeds the jurisdictional limits of all lower courts;

D. An award of punitive damages;

E. An award of costs that plaintiffs have incurred in this action, as well as plaintiffs' reasonable attorney's fees to the fullest extent permitted by law; and.

F. Such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: 

Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,

Index No.: _____/19

Plaintiffs,

**ATTORNEY
VERIFICATION**

-against-

**DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,**

Defendants.

-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of
New York State, and a member of the firm **MERSON LAW, PLLC**, attorneys for the
plaintiffs in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same
is true to his own knowledge, except as to the matters therein stated to be alleged upon
information and belief, and that as to those matters he believes it to be true;

That the sources of his information and knowledge are investigations and records in the
file; and,

That the reason this verification is made by affirmant and not by the plaintiffs is that the
plaintiff are not within the County where the attorney has his office.

Dated: New York, New York
December 3, 2019



JORDAN K. MERSON

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV,
JANE DOE V, JANE DOE VI, JANE DOE VII, JANE DOE VIII
and JANE DOE IX,

Plaintiffs,

- against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

Defendants.

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC

Attorneys for Plaintiffs

Office and P.O Address, Telephone

150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

To All Parties

EXHIBIT

2

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X
JANE DOE I, *et al.*, :
 :
 :
 Plaintiffs. : Index No. 950230/2019
 :
 : Hon. George J. Silver
 :
 - against - : **STIPULATION AND**
 : **[PROPOSED] ORDER**
 : **ON PLAINTIFFS'**
 : **ANONYMITY**
 DARREN K. INDYKE and RICHARD D. KAHN, in :
 their capacities as the executors of the ESTATE OF :
 JEFFREY EDWARD EPSTEIN, :
 : (Motion Seq. 001)
 Defendants. :
----- X

IT IS HEREBY STIPULATED AND AGREED. by and between the undersigned attorneys, that any person subject to this Order, including the parties to this action and their respective counsel of record, shall adhere to the following terms:

1. Within three (3) days of entry of this Order, Counsel of Record for Plaintiffs shall disclose Plaintiffs' identities to Counsel of Record for Defendants, in writing.
2. Counsel of Record for Defendants may disclose Plaintiffs' identities only to Defendants and any attorneys, paralegals, and clerical or other assistants working with or for Defendants on matters related to this action; and the recipients of such information shall not disclose it to any other persons.
3. If Defendants wish to disclose Plaintiffs' identities to any person not otherwise permitted to receive such information under this Order, Defendants are limited to doing so in connection with defending this action, and must require such person to first execute a non-disclosure agreement, in a form agreed to by the parties, that prevents such person from disclosing Plaintiffs' identities to any other persons. Defendants must maintain a list of all such persons to whom Plaintiffs' identities are disclosed and copies of the executed non-disclosure agreements, all of which are subject to *in camera* inspection.
4. All portions of pleadings, motions or other papers filed with the Court that disclose Plaintiffs' identities shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. All parties shall use their best efforts to minimize such sealing. Any party filing a motion or any other papers with the Court under seal

shall also publicly file a redacted copy of the same, via NYSCEF, that redacts the Plaintiffs' identities and text that would reveal Plaintiffs' identities.

5. The parties may seek to modify or amend this Order at any time upon motion to the Court or by stipulation.
6. Motion Seq. 001 is resolved by entry of this Order; and the hearing on Motion Seq. 001 currently set for December 17, 2019 at 3:00 p.m. is canceled.

AND IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in counterparts; and facsimile signatures are deemed originals.

Dated: New York, New York
December 5, 2019

MERSON LAW, PLLC

TROUTMAN SANDERS LLP

By: Jordan Merson
Jordan K. Merson
150 East 58th Street, 34th Floor
New York, NY 10155
(212) 603-9100

Attorneys for Plaintiffs

By: Bennet J. Moskowitz / K.B.
Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
(212) 704-6000

*Attorneys for Defendants Darren K. Indyke and
Richard D. Kahn, Co-Executors of the Estate of Jeffrey
E. Epstein*

SO ORDERED.

Date: _____
New York, New York

HON. GEORGE J. SILVER, J.S.C.

EXHIBIT

3



STATE OF NEW YORK
UNIFIED COURT SYSTEM
111 CENTRE STREET
NEW YORK, N.Y. 10013
(646) 386-4200

LAWRENCE K. MARKS
Chief Administrative Judge

GEORGE J. SILVER
Deputy Chief Administrative Judge
New York City Courts

ADMINISTRATIVE ORDER #371
AMENDED

By the authority vested in me as Deputy Chief Administrative Judge of the courts within New York City, and as the coordinating judge of all cases filed under the Child Victims Act¹ (the "CVA") within that jurisdiction, I hereby order as follows:

1. This Order applies to all cases filed or hereafter filed in the Supreme Courts in and for the counties of Bronx, Kings, New York, Queens, and Richmond pursuant to the CVA, including any such matters filed before the one-year window commenced on August 14, 2019, and which were then stayed pending the opening of the window on August 14, 2019.
2. While a steering committee negotiates a Case Management Order to address the efficient prosecution and defense of cases filed under the CVA, all Preliminary Conferences currently scheduled or requested as of the effective date of this Order, and any requests for Preliminary Conferences made after the effective date of this Order are adjourned to a control date of January 31, 2020.²
3. The time to respond to any discovery demands served by the parties as of the effective date of this Order is adjourned without a date. No demands for discovery shall be served by any party until further Order of this Court.
4. Plaintiffs' time to respond to stipulations and orders that consent to or direct the production of identifying information, consisting of a plaintiff's name (including maiden name, if any), date of birth, social security number, parents and/or guardian's names, current address, and address at the time of the alleged abuse, for plaintiffs proceeding under pseudonyms is extended to December 20, 2019. Plaintiffs shall provide such identifying information to

¹ L. 2019 c.11.

² Parties may make an application to extend this, and other deadlines, as necessary.

defense counsel in a manner other than disclosure in a public filing on NYSCEF and as agreed to by the parties. Nothing in this Order prevents plaintiffs from voluntarily providing such identifying information at any time.

5. All papers in opposition to any Order to Show Cause or Notice of Motion, including motions to dismiss under CPLR §3211 or §3212, but excluding motions to proceed anonymously or by pseudonym, are adjourned until January 31, 2020. Should the motion(s) not be resolved and withdrawn by the parties as of that date, the Court will set any additional due dates as necessary. No motions, other than motions to proceed anonymously or by pseudonym, shall be filed prior to January 31, 2020 without permission of the Court. As such, no motions to dismiss under CPLR §3211 or §3212 shall be filed prior to January 31, 2020.
6. The time to answer, move against, or otherwise respond to any complaint that has been served as of the effective date of this Order is extended until further Order of the Court. This Order supersedes any due dates for answers or motions previously stipulated to by the parties and/or ordered by this Court.
7. The time to answer, move against, or otherwise respond to any complaint that is served after the effective date of this Order, but prior to January 31, 2020, shall be extended until a date stipulated to by the parties or as directed by further Order of the Court.
8. Notwithstanding any stipulation or Court Order to the contrary, no motion to sever shall be filed prior to January 31, 2020. Consistent with the CPLR, motions to sever may be filed after January 31, 2020.
9. Counsel shall make a good faith effort to resolve any motions to dismiss or motions to sever prior to filing such motions.

Dated: December 11, 2019



Hon. George J. Silver
Deputy Chief Administrative Judge
New York City Courts

THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK - DEPARTMENT OF HEALTH AND MENTAL HYGIENE
AUG-11-2019 07:36 PM CERTIFICATE OF DEATH Certificate No. 158-19-032838

19 AUG 15 PM 11 10
SUPERIOR COURT
THE VIRGIN ISLANDS

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD EPSTEIN**
(First, Middle, Last)

Place of Death 2a. New York City 2b. Borough Manhattan	2c. Type of Place 1 <input type="checkbox"/> Hospital Inpatient 2 <input checked="" type="checkbox"/> Emergency Dept./Outpatient 3 <input type="checkbox"/> Dead on Arrival 4 <input type="checkbox"/> Nursing Home/Long Term Care Facility 5 <input type="checkbox"/> Hospice Facility 6 <input type="checkbox"/> Decedent's Residence 7 <input type="checkbox"/> Other Specify _____	2d. Any Hospice care in last 30 days 1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No 3 <input type="checkbox"/> Unknown	2e. Name of hospital or other facility (if not facility, street address) New York-Presbyterian-Lower Manhattan Hospital		
Date and Time of Death or Found Dead 3a. (Month) August 3b. (Day) 10 3c. (Year-yyyy) 2019 3d. Time 7:36 3e. AM <input type="checkbox"/> PM <input checked="" type="checkbox"/>	4. Sex Male	5. OCME Case No. M19019432			
6. I. Immediate Cause a. Due to or as a consequence of b. Due to or as a consequence of c. Due to or as a consequence of Other significant conditions contributing to death but not resulting in the underlying cause given in Part I. Include operation information.	PART I Pending Further Study				
	PART II				
7a. Injury Date (mm, dd, yyyy) ***	7b. Time <input type="checkbox"/> AM <input type="checkbox"/> PM	7c. At Work 1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No	7d. State of Injury - All injuries, fractures, street, etc. 7e. Location		
7f. How Injury Occurred					
7g. If Transportation Injury Specify <input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify _____	8. Manner of Death <input checked="" type="checkbox"/> Pending further study <input type="checkbox"/> Natural <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Unintentional	9. Autopsy <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Pathologist Signature: <i>[Signature]</i> Center Name: NYC Health + Hospitals	10. On the basis of examination and/or investigation, in my opinion, death occurred due to D.O. Date AUG-11-2019 M.D. ROSEMAN Medical Examiner (Medical Internist, Deputy Chief, Chief Medical Examiner)		
11a. Usual Residence State US Virgin Islands	11b. County St. Thomas	11c. Co. or town St. Thomas	11d. Street or location St. John James Island	11e. ZIP Code 00802	11f. Inside City Limits? 1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No
12. Date of Birth (Month) (Day) (Year-yyyy) January 20 1953	13. Age at last birthday (years) 66	14. Social Security No. 3348			
15a. Usual Occupation (Type of work done during most of preceding 12 months) Consultant	15b. Kind of business or industry Finance	15c. Agency or SIC#			
17. Birthplace (City & State or Foreign Country) Brooklyn, New York	18. Education (Check the box that best describes the highest degree or level of education attained at the time of death) 1 <input type="checkbox"/> No grade school 2 <input type="checkbox"/> 8th or more grades in US 3 <input type="checkbox"/> High school graduate or GED 4 <input type="checkbox"/> Bachelor's degree 5 <input type="checkbox"/> Some college 6 <input type="checkbox"/> Associate degree 7 <input type="checkbox"/> Bachelor's degree 8 <input type="checkbox"/> Master's degree 9 <input type="checkbox"/> Doctoral degree (e.g., MD, DDS, DVM, LL.M., JD)				
19. Ever in U.S. Armed Forces? 1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No	20. Marital Partnership Status at time of death 1 <input type="checkbox"/> Married 2 <input type="checkbox"/> Domestic Partnership 3 <input type="checkbox"/> Married, but separated 4 <input type="checkbox"/> Other, Specify _____	21. Surviving Spouse (Last name prior to last marriage) (First, Middle, Last) Paula Slatofsky			
22. Father's Name (First, Middle, Last) Seymour Epstein	23. Mother's Name (Last name prior to last marriage) (First, Middle, Last) Paula Slatofsky				
24a. Informant's Name Mark Epstein	24b. Relationship to Decedent Brother	24c. Address (Street and Number) City & State [Redacted]	24d. ZIP Code 304 11-8219		
25a. Method of Disposition 1 <input type="checkbox"/> Burial 2 <input type="checkbox"/> Cremation 3 <input type="checkbox"/> Entombment 4 <input type="checkbox"/> City Cemetery 5 <input type="checkbox"/> Other Specify _____	25b. Place of Disposition (Name of cemetery, crematory, other place)				
25c. Location of Disposition (City, State or Foreign Country)	25d. Date of Disposition mm dd yyyy 08 13 2019				
25e. Funeral Establishment	25f. Address (Street and Number) City & State ZIP Code 1076 Madison Ave New York, NY 10028-0237				

(To be filed by the OCME)
(To be filed by the Registrar of Vital Records)
(To be filed by the Registrar of Vital Records)

EVT20190837726

[Signature]
Gretchen Van Wye, Ph.D., City Registrar as of 3/1/19

August 11, 2019

VR 18 (Rev. 01/08)

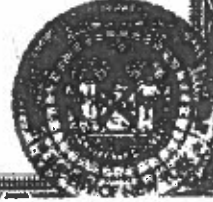
This is to certify that the foregoing is a true copy of a record on file in the Department of Health and Mental Hygiene. The Department of Health and Mental Hygiene does not certify to the truth of the statements made thereon, as no inquiry as to the facts has been provided by law.

Do not accept this transcript unless it bears the security features listed on the back. Reproduction or alteration of this transcript is prohibited by §3-19(b) of the New York City Health Code if the purpose is the evasion or addition of any provision of the Health Code or any other law.

[Signature]
Steven P. Schwartz, Ph.D., City Registrar



Y01383215



EXHIBIT

2

THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK - DEPARTMENT OF HEALTH AND MENTAL HYGIENE
AUG-11-2019 07:36 PM CERTIFICATE OF DEATH Certificate No. 156-19-032838

19 AUG 15 5 15 PM '19
SUPERIOR COURT
THE VIRGIN ISLANDS

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD ERSTEIN**
(First, Middle, Last)

Place of Death	2a. New York City	2b. Borough	2c. Type of Place	4 <input type="checkbox"/> Nursing Home/Long Term Care Facility	2d. Any Hospice care in last 30 days	5a. Name of hospital or other facility (if not facility, street address)	
	Manhattan	1 <input type="checkbox"/> Hospital Inpatient 2 <input checked="" type="checkbox"/> Emergency Dept./Outpatient 3 <input type="checkbox"/> Dead on Arrival	5 <input type="checkbox"/> Hospice Facility 6 <input type="checkbox"/> Decedent's Residence 7 <input type="checkbox"/> Other Specify	1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No 3 <input type="checkbox"/> Unknown	New York-Presbyterian-Lower Manhattan Hospital		
Date and Time of Death or Found Dead	3a. (Month)	(Day)	(Year-yyyy)	3b. Time	AM <input checked="" type="checkbox"/> PM <input type="checkbox"/>	4. Sex	5. OCME Case No.
	August	10	2019	7:36	Male	M19019432	
5. C. C. REPORT CATEGORY	a. Immediate cause Pending Further Study						
	b. Due to or as a consequence of						
PART II Other significant conditions contributing to death but not resulting in the underlying cause given in Part I. Include operation information.							
7a. Injury Date (mm dd yyyy)	7b. Time	<input type="checkbox"/> AM <input type="checkbox"/> PM	7c. At Work <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	7d. Place of Injury	7e. Location		
7f. How Injury Occurred							
7g. If Transportation Injury Specify	8. Manner of Death		9. Autopsy		10. On the basis of examination and/or investigation, in my opinion, death occurred due to		
<input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify	<input checked="" type="checkbox"/> Pending further study <input type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Undetermined		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Autopsy Performed or Not Performed		Cause of Death: Heart Disease D.O. M.D. Date AUG-11-2019 Medical Examiner: ANTHONY J. PUGHAN Medical Examiner (County): NEW YORK COUNTY		
11a. Usual Residence State	11b. County	11c. City or Town	11d. Block or Precinct	11e. State	ZIP Code	11f. Inside City Limits?	
US Virgin Islands	St. Thomas	St. Thomas	St. James Island		00802	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12. Date of Birth (Month) (Day) (Year-yyyy)	13. Age at last birthday (years)	14. Social Security No.					
January 20 1943	66	-3348					
15a. Usual Occupation (Type of work done during last 12 months)	15b. Kind of business or industry	15c. Industry of SICs					
Consultant	Finance	...					
17. Birthplace (City & State or Foreign Country)	18. Education (Check the box that best describes the highest level of education received at the time of death)						
Brooklyn, New York	1 <input type="checkbox"/> No grade level; none 2 <input type="checkbox"/> 8th grade or less 3 <input type="checkbox"/> High school graduate or GED 4 <input type="checkbox"/> Some college 5 <input type="checkbox"/> Bachelor's degree or higher						
19. Ever in U.S. Armed Forces? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	20. Marital Partnership Status at time of death		21. Spouse's Name (Last name prior to last marriage) (First, Middle, Last)				
	1 <input type="checkbox"/> Married <input type="checkbox"/> Domestic Partnership <input type="checkbox"/> Divorced 4 <input type="checkbox"/> Married, but separated 7 <input type="checkbox"/> Other, Specify		Paula Stolovsky				
22. Father's Name (First, Middle, Last)			23. Mother's Name (Last name prior to last marriage) (First, Middle, Last)				
Seymour Epstein			Paula Stolovsky				
24a. Informant's Name	24b. Relationship to Decedent	25. Place of Disposition (Place of entombment, crematory, other place)					
Mark Epstein	Brother	...					
25a. Method of Disposition	25b. Location of Disposition (City, State or Foreign Country)						
1 <input type="checkbox"/> Burial 2 <input type="checkbox"/> Cremation 3 <input checked="" type="checkbox"/> Entombment 4 <input type="checkbox"/> City Cemetery	25c. Date of Disposition mm dd yyyy 08 13 2019						
26a. Funeral Establishment	26b. Address (Street and Number) City & State ZIP Code						
...	1076 Madison Ave New York, NY 10028-0237						

(To be filled in by the OCME)
(To be filled in by Funeral Director or, in case of City Burial, by OCME)

EVY201908377726

Bethan Vertice
Bethan Vertice, Ph.D., City Registrar as of 8/1/18

August 11, 2019

VR 18 (Rev. 07/08)

This is to certify that the foregoing is a true copy of a record on file in the Department of Health and Mental Hygiene. The Department of Health and Mental Hygiene does not certify to the truth of the statements made thereon, as no inquiry as to the facts has been provided by law.

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Steven P. Schwartz
Steven P. Schwartz, Ph.D., City Registrar



Y01383215



**AS AND FOR A TWENTY-FOURTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VIII AS TO JEFFREY EDWARD EPSTEIN**

224. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 223., inclusive, with the same force and effect as if hereafter set forth at length.

225. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

226. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, Plaintiff to suffer severe emotional distress.

227. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

228. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

229. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

230. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FIFTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

231. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 230., inclusive, with the same force and effect as if hereafter set forth at length.

232. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

233. In or about 2002 and continuing thereafter, Jeffrey Edward Epstein sexually abused Plaintiff Jane Doe IX when she was approximately twenty-two-years-old.

234. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

235. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

236. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

237. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

238. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

239. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SIXTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

240. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 239., inclusive, with the same force and effect as if hereafter set forth at length.

241. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

242. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

243. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

244. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

245. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

246. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

247. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SEVENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

248. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 247., inclusive, with the same force and effect as if hereafter set forth at length.

249. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

250. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

251. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

252. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling Plaintiff to recover punitive damages in amounts to be proven at trial.

253. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

254. This action falls within the exceptions to Article 16 of the C.P.L.R.

WHEREFORE, plaintiffs demand judgement against defendants in such sum as a jury would find fair, adequate and just containing the following relief:

- A. A declaratory judgement that the actions, conduct and practices of defendants complained of herein violated the laws of the State of New York;
- B. An injunction and order permanently restraining defendants from engaging in such unlawful conduct;
- C. An award of damages in an amount to be determined at trial, plus prejudgment interest, to compensate plaintiffs for all monetary and/or economic harm; harm to their personal and professional reputations and loss of career fulfillment; for all non-monetary and/or compensatory harm, including but not limited to, compensation for physical anguish and mental

anguish; all other monetary and/or non-monetary losses suffered by plaintiffs; and that by reason of the foregoing, plaintiffs sustained damages in a sum, pursuant to C.P.L.R. §3017, which exceeds the jurisdictional limits of all lower courts;

D. An award of punitive damages;

E. An award of costs that plaintiffs have incurred in this action, as well as plaintiffs' reasonable attorney's fees to the fullest extent permitted by law; and.

F. Such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: 

Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,

Index No.: _____/19

Plaintiffs,

-against -

**ATTORNEY
VERIFICATION**

**DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,**

Defendants.

-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of
New York State, and a member of the firm **MERSON LAW, PLLC**, attorneys for the
plaintiffs in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same
is true to his own knowledge, except as to the matters therein stated to be alleged upon
information and belief, and that as to those matters he believes it to be true;

That the sources of his information and knowledge are investigations and records in the
file; and,

That the reason this verification is made by affirmant and not by the plaintiffs is that the
plaintiff are not within the County where the attorney has his office.

Dated: New York, New York
December 3, 2019



JORDAN K. MERSON

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV,
JANE DOE V, JANE DOE VI, JANE DOE VII, JANE DOE VIII
and JANE DOE IX,

Plaintiffs,

- against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

Defendants.

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC

Attorneys for Plaintiffs

Office and P.O. Address, Telephone

150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

To: All Parties

EXHIBIT

2

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X
JANE DOE I, *et al.*,

Plaintiffs.

- against -

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the ESTATE OF
JEFFREY EDWARD EPSTEIN,

Defendants.
----- X

:
:
: Index No. 950230/2019

:
: Hon. George J. Silver

:
: **STIPULATION AND**
: **[PROPOSED] ORDER**
: **ON PLAINTIFFS'**
: **ANONYMITY**

:
: (Motion Seq. 001)

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys, that any person subject to this Order, including the parties to this action and their respective counsel of record, shall adhere to the following terms:

1. Within three (3) days of entry of this Order, Counsel of Record for Plaintiffs shall disclose Plaintiffs' identities to Counsel of Record for Defendants, in writing.
2. Counsel of Record for Defendants may disclose Plaintiffs' identities only to Defendants and any attorneys, paralegals, and clerical or other assistants working with or for Defendants on matters related to this action; and the recipients of such information shall not disclose it to any other persons.
3. If Defendants wish to disclose Plaintiffs' identities to any person not otherwise permitted to receive such information under this Order, Defendants are limited to doing so in connection with defending this action, and must require such person to first execute a non-disclosure agreement, in a form agreed to by the parties, that prevents such person from disclosing Plaintiffs' identities to any other persons. Defendants must maintain a list of all such persons to whom Plaintiffs' identities are disclosed and copies of the executed non-disclosure agreements, all of which are subject to *in camera* inspection.
4. All portions of pleadings, motions or other papers filed with the Court that disclose Plaintiffs' identities shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. All parties shall use their best efforts to minimize such sealing. Any party filing a motion or any other papers with the Court under seal

shall also publicly file a redacted copy of the same, via NYSCEF, that redacts the Plaintiffs' identities and text that would reveal Plaintiffs' identities.

5. The parties may seek to modify or amend this Order at any time upon motion to the Court or by stipulation.
6. Motion Seq. 001 is resolved by entry of this Order; and the hearing on Motion Seq. 001 currently set for December 17, 2019 at 3:00 p.m. is canceled.

AND IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in counterparts; and facsimile signatures are deemed originals.

Dated: New York, New York
December 5, 2019

MERSON LAW, PLLC

TROUTMAN SANDERS LLP

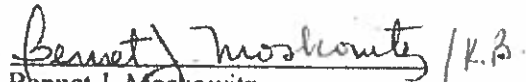
By: _____



Jordan K. Merson
150 East 58th Street, 34th Floor
New York, NY 10155
(212) 603-9100

Attorneys for Plaintiffs

By: _____



Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
(212) 704-6000

*Attorneys for Defendants Darren K. Indyke and
Richard D. Kahn, Co-Executors of the Estate of Jeffrey
E. Epstein*

SO ORDERED.

Date: _____

New York, New York

HON. GEORGE J. SILVER, J.S.C.

EXHIBIT

3



STATE OF NEW YORK
UNIFIED COURT SYSTEM
111 CENTRE STREET
NEW YORK, N.Y. 10013
(646) 386-4200

LAWRENCE K. MARKS
Chief Administrative Judge

GEORGE J. SILVER
Deputy Chief Administrative Judge
New York City Courts

ADMINISTRATIVE ORDER #371
AMENDED

By the authority vested in me as Deputy Chief Administrative Judge of the courts within New York City, and as the coordinating judge of all cases filed under the Child Victims Act¹ (the "CVA") within that jurisdiction, I hereby order as follows:

1. This Order applies to all cases filed or hereafter filed in the Supreme Courts in and for the counties of Bronx, Kings, New York, Queens, and Richmond pursuant to the CVA, including any such matters filed before the one-year window commenced on August 14, 2019, and which were then stayed pending the opening of the window on August 14, 2019.
2. While a steering committee negotiates a Case Management Order to address the efficient prosecution and defense of cases filed under the CVA, all Preliminary Conferences currently scheduled or requested as of the effective date of this Order, and any requests for Preliminary Conferences made after the effective date of this Order are adjourned to a control date of January 31, 2020.²
3. The time to respond to any discovery demands served by the parties as of the effective date of this Order is adjourned without a date. No demands for discovery shall be served by any party until further Order of this Court.
4. Plaintiffs' time to respond to stipulations and orders that consent to or direct the production of identifying information, consisting of a plaintiff's name (including maiden name, if any), date of birth, social security number, parents and/or guardian's names, current address, and address at the time of the alleged abuse, for plaintiffs proceeding under pseudonyms is extended to December 20, 2019. Plaintiffs shall provide such identifying information to

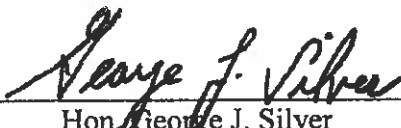
¹ L. 2019 c.11.

² Parties may make an application to extend this, and other deadlines, as necessary.

defense counsel in a manner other than disclosure in a public filing on NYSCEF and as agreed to by the parties. Nothing in this Order prevents plaintiffs from voluntarily providing such identifying information at any time.

5. All papers in opposition to any Order to Show Cause or Notice of Motion, including motions to dismiss under CPLR §3211 or §3212, but excluding motions to proceed anonymously or by pseudonym, are adjourned until January 31, 2020. Should the motion(s) not be resolved and withdrawn by the parties as of that date, the Court will set any additional due dates as necessary. No motions, other than motions to proceed anonymously or by pseudonym, shall be filed prior to January 31, 2020 without permission of the Court. As such, no motions to dismiss under CPLR §3211 or §3212 shall be filed prior to January 31, 2020.
6. The time to answer, move against, or otherwise respond to any complaint that has been served as of the effective date of this Order is extended until further Order of the Court. This Order supersedes any due dates for answers or motions previously stipulated to by the parties and/or ordered by this Court.
7. The time to answer, move against, or otherwise respond to any complaint that is served after the effective date of this Order, but prior to January 31, 2020, shall be extended until a date stipulated to by the parties or as directed by further Order of the Court.
8. Notwithstanding any stipulation or Court Order to the contrary, no motion to sever shall be filed prior to January 31, 2020. Consistent with the CPLR, motions to sever may be filed after January 31, 2020.
9. Counsel shall make a good faith effort to resolve any motions to dismiss or motions to sever prior to filing such motions.

Dated: December 11, 2019

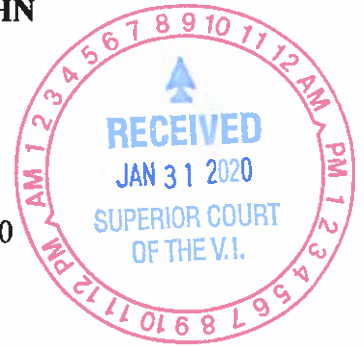


Hon. George J. Silver
Deputy Chief Administrative Judge
New York City Courts

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

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

Case No. ST-19-PB-80



Claim for Unliquidated and Unsecured Damages

COME NOW, Claimant Jane Doe II (“Claimant”), through her attorney Melody D. Westfall, Esq. of Westfall Law, PLLC, 5032 Anchor Way, Suite 8, Christiansted, St. Croix 00820, and hereby present and file this claim for unliquidated and unsecured damages from the estate in the above-referenced matter, and state as follows:

1. Prior to being arrested and brought into custody on July 6, 2019 by federal authorities in New York, the decedent, Jeffrey E. Epstein (the “Decedent”), was the subject of multiple on-going investigations into his criminal conduct including, but not limited to, his sex trafficking and sexual abuse of dozens of women, some of whom were underage. Claimant is one of those victims.

2. On information and belief, after his arrest, the decedent conspired with multiple individuals, including his attorneys and the two men named as the co-executors of his estate, to fraudulently convey and prevent the distribution of his assets to his numerous victims, including Claimant, in the event that they sought damages through civil recourse.

3. The deceased was able to do this by executing a Last Will and Testament on August 8, 2019, which included a newly formed pour-over trust known as The 1953 Trust (the “Trust”), just two days before his death by suicide on August 10, 2019. There is no doubt that these documents were set-up to defraud his creditors, including Ms. Claimant. A true and correct copy

of the decedent's Last Will and Testament is annexed hereto as Exhibit "1" and a true and correct copy of decedent's death certificate is attached hereto as Exhibit "2".

4. In decedent's petition for probate and letters testamentary, the value of personal property and total estate property is listed at \$577,672,654.00. See Exhibit 1.

5. On December 3, 2019, Claimant and eight of her fellow survivors filed a civil action in the Supreme Court of the State of New York, County of New York (New York County Index No.: 950230/2019) seeking damages against the decedent's estate. A true and correct copy of the Summons and Verified Complaint is annexed hereto as Exhibit "3".

6. Claimant's claim is timely pursuant to NY CPLR § 215(8)(a) which provides that a claimant shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against the deceased with respect to the same sex trafficking enterprise and sexual conduct from which Claimant's claim arises, was terminated less than a year ago on August 29, 2019.

7. Specifically, starting in or about 1985 and continuing for a period of time thereafter, when Claimant was approximately twenty-three years old, Epstein and his associates repeatedly sexually assaulted, abused, battered and raped her, which caused severe and serious injuries.

8. As such, Claimant, by and through the above-referenced claim, has a right to money damages, whether it is in the form of a judgment or liquidated, fixed or matured damages, and therefore, has an equitable lien on all unencumbered assets and property of the decedent's estate.

9. Accordingly, Claimant's claim requires that this Court not only secure sufficient assets from the estate to pay her for whatever damages and losses she may be deemed entitled to

for which further information can be provided upon request, but also prevent the sale, transfer or waste of any assets or property that are part of the decedent's estate.

WHEREFORE, Claimant prays that the Court (a) enter judgment against decedent's estate in an amount sufficient to satisfy her Final Judgment in all pending matters, along with interest, attorneys' fees and punitive damages related to the decedent's fraudulent scheme and activities; (b) or in the alternative, stay all further proceedings in this matter pending the disposition of Claimant's New York lawsuit against the Estate; and, (c) all other further relief as this Court may deem just and proper.

This Claim is verified by counsel, pursuant to 15 V.I.C. § 393 and 5 V.I.C. § 699, as it is sworn under penalties of perjury that the contents hereof are true and correct to the best of the undersigned counsel's knowledge, information and belief.

Dated: Christiansted, St. Croix
January 31, 2020

Respectfully Submitted,



Melody D. Westfall, Esq.

V.I. Bar Number 122052

WESTFALL LAW PLLC

5032 Anchor Way, Suite 8

Christiansted, St. Croix 00820

mwestfall@westfalllaw.com

(340) 227-0017

Attorneys for Claimant Jane Doe II

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2020, I caused a true and correct copy of the foregoing

Claim for Unliquidated and Unsecured Damages to be served on the following:

William Blum, Esq.
KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Darren K. Indyke, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Richard Kahn, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Douglas B. Chanco, Esq.
CHANCO SCHIFFER LAW, LLC
9053 Sugar Estate, Suite 103
St. Thomas, USVI 00802

A. Jeffrey Weiss, Esq.
A.J. WEISS & ASSOCIATES
6934 Vessup Lane
St. Thomas, USVI 00802

Sean E. Foster, Esq.
Robert V. Goldsmith III, Esq.
MAJORIE RAWLS ROBERTS, P.C.
5093 Dronningens Gade, Suite 1
St. Thomas, USVI 00802

Richard P. Bourne-Vanneck, Esq.
RICHARD P. BOURNE-VANNECK, P.C. d/b/a
LAW OFFICES OF RICHARD P. BOURNE-VANNECK
9800 Buccaneer Mall, Suite 9
St. Thomas, USVI 00802

Mariann Meier Wang, Esq.
Daniel Mullkoff, Esq.
CUTI HECKER WANG LLP
305 Broadway, Suite 607
New York, NY 10007

Gloria Allred, Esq.
ALLRED, MAROKO & GOLDBERG
305 Broadway, Suite 607
New York, NY 10007

John H. Benham, Esq.
LAW OFFICE OF JOHN H. BENHAM, P.C.
9800 Buccaneer Mall Building 2, Suite 9
P.O. Box 11720
St. Thomas, USVI 00801

EXHIBIT

1

LAST WILL AND TESTAMENT

OF

JEFFREY E. EPSTEIN

I, JEFFREY E. EPSTEIN, a resident and domiciliary of St. Thomas, United States Virgin Islands, do make, publish and declare this to be my Will hereby revoking all prior Wills and Codicils made by me.

1: I direct my Executor to pay from my estate all expenses of my last illness, my funeral and burial expenses, the administration expenses of my estate and all of my debts duly proven and allowed against my estate.

A. I direct my Executor to pay from my estate, as compensation to each Executor for serving as Executor hereunder, the sum of Two Hundred Fifty Thousand Dollars (\$250,000) to each Executor upon the completion of probate of my estate. No Executor shall receive any other compensation for serving as Executor hereunder; provided, however, that my Executor shall be reimbursed from my estate for all reasonable costs, expenses, charges, and liabilities incurred or paid in respect thereto, including fees and expenses of counsel or any other agents hired by my Executor, and my Executor shall not be liable therefor individually.

B. I direct my Executor to pay from my estate the federal and state transfer taxes described in Paragraph B(1) of Article SEVENTH.

C. I direct my Executor to pay from my estate all expenses of storing, insuring, packing, shipping and delivering my tangible personal property in accordance with the provisions of Article SECOND.

2: I give all of my property, real and personal, wherever situated, after the payments and distributions provided in Article FIRST, to the then acting Trustees of The 1953 Trust ("Trust") created under that certain Trust Agreement of The 1953 Trust (the "Trust Agreement") dated August 8, 2019, as the same may be amended from time to time, to be held in accordance with the provisions comprising the Trust Agreement at the time of my death.

3: I appoint DARREN K. INDYKE and RICHARD D. KAHN to serve as the Executors of this Will. If any one or more of my Executors fails to qualify, is unable or unwilling to serve or ceases to act, I appoint BORIS NIKOLIC, as successor Executor. If any successor Executor fails to qualify, is unable or unwilling to serve or ceases to act, I authorize the last acting Executor to designate his or her successor. Such designation shall be made by written instrument delivered to such designated successor Executor.

A. If my estate must be administered in whole or in part in any jurisdiction other than the state or territory of my domicile at the date of my death, and if my Executor is unable or unwilling to serve in such jurisdiction, then I appoint the successor Executor of my estate designated in Paragraph A of Article THIRD as successor Executor in such



jurisdiction only, provided that he or she is able and willing to serve in such jurisdiction. If no Executor or successor Executor is able and willing to serve in such jurisdiction, my Executor shall designate a successor Executor to serve in such jurisdiction. Such designation shall be made by written instrument delivered to such successor Executor.

B. No bond or other security shall be required of any Executor in any jurisdiction.

C. Any Executor may resign in the manner provided for by the governing statutes of the state or territory having jurisdiction of the administration of my estate or in the absence of such statutory guidance, by filing a written notice of resignation with the Court having jurisdiction of the administration of my estate. Any Executor who resigns shall not be entitled to any compensation hereunder for any services rendered as Executor prior to his or her resignation.

D. My Executor shall not be accountable or responsible to any person interested in my estate for the manner in which my Executor in good faith exercises or declines to exercise any discretionary authority or power of my Executor. My Executor shall not be liable for any loss or depreciation in value occasioned by reason of any negligence, error or mistake of judgment in entering into any transaction, in making any sale or investment, in continuing to hold any property or by reason of any action or omission, whether by my Executor or any other fiduciary, unless my Executor has acted in bad faith. In the absence of proof by affirmative evidence to the contrary, each Executor shall be deemed to have acted within the scope of my Executor's authority, to have exercised reasonable care, diligence and prudence and to have acted impartially as to all interested persons. An Executor shall not be liable for the acts or defaults of another Executor.

4: The following provisions shall apply to my estate and to my Executor, except as is otherwise specifically provided in this Will:

A. My Executor has the entire care and custody of all assets of my estate. My Executor has the power to do everything my Executor in good faith deems advisable without necessity of any judicial authorization or approval, even though but for this power it would not be authorized or appropriate for fiduciaries under any statutory or other rule of law. My Executor shall exercise my Executor's best judgment and discretion for what my Executor believes to be in the best interests of the beneficiaries hereunder. Except as otherwise specifically provided in this Will, if two Executors are empowered to participate in the decision to exercise or not to exercise any fiduciary power granted by this Will or by law, such decision shall be made by such Executors acting unanimously. If more than two Executors are empowered to participate in the decision to exercise or not exercise any fiduciary power granted by this Will or by law, a majority of such Executors shall be empowered to make such decision.

B. Except as otherwise provided herein, my Executor shall have the power:

(1) to enter upon and take possession of the assets of my estate and collect the income and profits from such assets, and to invest and reinvest such assets in real, personal or mixed assets (including the common trust funds of a corporate

fiduciary) or in undivided interests therein without being limited by any present or future investment laws:

(2) to retain all or any part of the assets of my estate (without regard to the proportion that any one asset or class of assets may bear to the whole) in the form in which such assets were received or acquired by my Executor;

(3) to sell or dispose of, exchange, transfer, invest or loan all or any part of the assets of my estate which may, at any time, be held by my Executor for such sums or upon such terms as to payment, security or otherwise as my Executor determines, either by public or private transactions;

(4) to buy and sell options, warrants, puts, calls or other rights to purchase or sell (collectively "options") relating to any security or securities, regardless of whether such security or securities are then held by my Executor, and whether such options are purchased or sold on a national securities exchange, and to exercise with respect to such options all powers which an individual owner thereof could exercise, including, without limitation, the right to allow the same to expire;

(5) with respect to oil, natural gas, minerals, and all other natural resources and rights to and interests therein (together with all equipment pertaining thereto), including, without limiting the generality of the foregoing, oil and gas royalties, leases, or other oil and gas interests of any character, whether owned in fee, as lessee, lessor, licensee, concessionaire or otherwise, or alone or jointly with others as partner, joint tenant, or joint venture in any other noncorporate manner, (a) to make oil, gas and mineral leases or subleases; (b) to pay delay rentals, lease bonuses, royalties, overriding royalties, taxes, assessments, and all other charges; (c) to sell, lease, exchange, mortgage, pledge or otherwise hypothecate any or all of such rights and interests; (d) to surrender or abandon, with or without consideration, any or all of such rights and interests; (e) to make farm-out, pooling, and unitization agreements; (f) to make reservations or impose conditions on the transfer of any such rights or interests; (g) to employ the most advantageous business form in which properly to exploit such rights and interests, whether as corporations, partnerships, limited partnerships, mining partnerships, limited liability companies, joint ventures, co-tenancies, or otherwise exploit any and all such rights and interests; (h) to produce, process, sell or exchange all products recovered through the exploitation of such rights and interests, and to enter into contracts and agreements for or in respect of the installation or operation of absorption, reprocessing or other processing plants; (i) to carry any or all such interests in the name or names of a nominee or nominees; (j) to delegate, to the extent permitted by law, any or all of the powers set forth herein to the operator of such property; and (k) to employ personnel, rent office space, buy or lease office equipment, contract and pay for geological surveys and studies, procure appraisals, and generally to conduct and engage in any and all activities incident to the foregoing powers, with full power to borrow and pledge in order to finance such activities; together with the power to allocate between principal and income any net proceeds received as consideration, whether as royalties or otherwise, for the permanent severance from lands of oil, natural gas, minerals, and all other natural resources;

(6) to hold all or any part of the assets of my estate in cash or in bank accounts without the necessity of investing the same;

all or any part of the assets of my estate; (7) to improve, repair, partition, plat or subdivide

(8) to litigate, defend, compromise, settle, abandon or submit to arbitration on such terms and conditions as my Executor determines any claims in favor of or against my estate or the assets of my estate;

(9) to loan or borrow money in such amounts and upon such terms and conditions as my Executor determines, assume such obligations or give such guarantees as my Executor determines, for the purpose of the acquisition, improvement, protection, retention or preservation of the assets of my estate, or for the welfare of the beneficiaries of my estate;

(10) to carry on for as long and in such manner as my Executor determines any business enterprise in which I owned any interest at my death, either individually, or as a partner, member, joint venture, stockholder or trust beneficiary; to sell such business enterprise as an ongoing business; to consolidate, merge, encumber, dissolve, liquidate or undertake any other extraordinary corporate transaction relating to such business enterprise;

(11) to vote in person or by proxy any and all stock or securities and to become a party to any voting trusts, reorganization, consolidation or other capital or debt readjustment of any corporation, association, partnership, limited liability partnership, limited liability company or individual with respect to stocks, securities or debts held by my estate;

(12) except as provided for in Sections (20) and (21) of this Article Fourth, to enter into any good faith transactions with any Executor individually or with any corporation, partnership or other entity in which any Executor has an ownership interest;

(13) To purchase from my estate any stocks, bonds, securities, real or personal property, or other assets, or make loans to my estate even though the same person or persons occupy the office of my Trustee and the office of the Executor of my estate;

(14) to lease, mortgage, pledge, grant a security interest in or otherwise encumber all or any part of the assets of my estate for any term of years whether or not beyond the duration of my estate (including, without limitation, any such action for the benefit of any of the beneficiaries of my estate);

(15) to abandon any property of my estate, real or personal, which my Executor may deem worthless or not of sufficient value to warrant keeping or protecting; to abstain from the payment of taxes, water rents or assessments and to forego making repairs, maintaining or keeping up any such property; and to permit such property to be lost by tax sale or other proceedings or to convey any such property for a nominal consideration or without consideration so as to prevent the imposition of any liability by reason of the continued ownership thereof;

(16) to elect the mode of distribution of the proceeds payable to my estate from any profit-sharing plan, pension plan, employee benefit plan, individual retirement plan, insurance contract or annuity contract pursuant to the terms of such plan;

(17) to allocate, in my Executors discretion, any adjustment to basis provided to my estate under the provisions of Federal and State law with respect to property comprising my estate, without any obligation to make a compensatory adjustment among the beneficiaries hereunder on account of such allocation;

(18) to conduct any audit, assessment or investigation with respect to any asset of my estate regarding compliance with any law or regulation having as its object protection of public health, natural resources or the environment ("Environmental Laws"); to pay from the assets of my estate to remedy any failure to comply with any Environmental Law (even to the exhaustion of all of the assets of my estate); and, as may be required in my Executor's judgment by any Environmental Law, to notify any governmental authority of any past, present or future non-compliance with any Environmental Law; and

(19) to sell to the Trustee under the Trust Agreement any stocks, bonds, securities, real or personal property or other assets or borrow from the Trustee under the Trust Agreement even though the same person or persons occupy the office of the Executor of my estate and the Trustee under the Trust Agreement.

(20) No executor shall directly or indirectly buy or sell any property for the estate from or to himself, or from or to his relative, employer, employee, partner, or other business associate.

(21) No executor shall lend estate funds to himself, or to his relative, employer, employee, partner, or other business associate.

C. Except as otherwise provided herein, my Executor shall have the power:

(1) to employ agents, attorneys-at-law, consultants, investment advisers (to whom my Executor has discretion to delegate my Executor's investment authority and responsibility), other executors and other fiduciaries in the administration of my Executor's duties; to delegate to such persons, or to one or more of my Executors, the custody, control or management of any part of my estate as my Executor determines and to pay for such services from the assets of my estate, without obtaining judicial authorization or approval;

(2) to delegate, in whole or in part, to any person or persons the authority and power to (a) sign checks, drafts or orders for the payment or withdrawal of funds, securities and other assets from any bank, brokerage, custody or other account in which funds, securities or other assets of my estate shall be deposited, (b) endorse for sale, transfer or delivery, or sell, transfer or deliver, or purchase or otherwise acquire, any and all property, stocks, stock warrants, stock rights, options, bonds or other securities whatsoever, (c) gain access to any safe deposit box or boxes in which my assets or assets of my estate may be located or which may be in the name of my Executor and remove part or all of the contents of any such safe

deposit box or boxes and release and surrender the same, and (d) take any other action that my Executor may have the power to take with respect to my estate and the property thereof; no person or corporation acting in reliance on any such delegation shall be charged with notice of any revocation or change of such delegation unless such person or corporation receives actual notice thereof;

(3) to pay any property distributable to a beneficiary under a legal disability or who has not attained the age of 21, without liability to my Executor, by paying such property (a) to such beneficiary, (b) for the use of such beneficiary, (c) to a legal representative of such beneficiary appointed by a court or if none, to a relative for the use of such beneficiary, or (d) to a custodian for such beneficiary designated by my Executor, to hold until age 21 or such earlier age as shall be the maximum permitted under applicable law;

(4) to distribute to any of the beneficiaries of my estate in kind or in cash, or partly in kind and partly in cash, and to allocate different kinds or disproportionate shares of assets or undivided interests in assets among all of such beneficiaries;

(5) to have evidence of ownership of any security maintained in the records of a Federal Reserve Bank under the Federal Reserve Book Entry System; to deposit funds in any bank or trust company; to carry in the name of my Executor or the nominee or nominees of my Executor and with or without designation of fiduciary capacity, or to hold in bearer form, securities or other property requiring or permitting of registration; and to cause any securities to be held by a depository corporation of which an Executor is a member or by an agent under a safekeeping contract; provided, however, that the books and records of my Executor shall at all times show that such investments are part of my estate;

(6) to renounce and disclaim, in whole or in part, and in accordance with applicable law, any assets, interests, rights or powers (including any power of appointment) which are payable to (or exercisable by) me or my estate, which are includible in my estate or Gross Estate or over which I have any right, title, interest or power; and

(7) to make, execute and deliver any and all such instruments in writing as shall be necessary or proper to carry out any power, right, duty or obligation of my Executor or any disposition whatsoever of my estate or any asset of my estate and to exercise any and all other powers incidental or necessary to carry out or to fulfill the terms, provisions and purposes of my estate.

D. In connection with any insurance policy or annuity on the life of an Executor which is included in my estate, such Executor shall not participate in the decision to exercise or not exercise any fiduciary power in connection with any incidents of ownership for such policy or annuity, including, without limitation, any decision to continue, assign, terminate or convert such policy or annuity or to name the beneficiary of such policy or annuity.

E. An Executor hereunder may by a written notice delivered to the other Executor decline to participate in the decision to exercise or not exercise any fiduciary power granted by this Will or by law.

F. If an Executor is not empowered (because of a conflict of

interest, declination to act or otherwise) to participate in the decision to exercise or not exercise any fiduciary power granted by this Will or by law, then the remaining Executor shall be empowered to make such decision. If no Executor is empowered to participate in such decision, then the successor Executor of my estate designated in Paragraph A of Article THIRD and able and willing to act shall be empowered to make such decision. If no Executor or successor Executor is empowered to participate in such decision, my Executor may designate a successor Executor to serve as Executor of my estate who shall be empowered to make such decision but shall have no other power or authority of my Executor. Such designation shall be by written notice delivered to such successor Executor.

G. Except as otherwise specifically provided in this Paragraph G(1) of this Article, and except as provided in Paragraph G(2) of this Article, my Executor shall allocate receipts and disbursements in accordance with sound trust accounting principles and shall have discretion to allocate receipts and disbursements when the treatment is uncertain under applicable laws or generally accepted accounting principles in the judgment of my Executor.

(1) Except as otherwise specifically provided in this Will, my Executor shall not treat any part of the principal amount of the proceeds of sale of any asset of my estate as income distributable to or for the benefit of any beneficiary entitled to distributions of income; provided, however, that my Executor shall treat a portion of any proceeds of sale of any financial instrument originally issued or acquired at a discount equal to the amount which (a) has previously been characterized as ordinary income for income tax purposes or (b) will be characterized as ordinary income for income tax purposes in the year of such sale, as income for trust accounting purposes.

5: Where a party to any proceeding with respect to my estate has the same interest as a person under a disability, it shall not be necessary to serve legal process on the person under a disability.

6: If any beneficiary under the Trust shall in any way directly or indirectly (a) contest or object to the probate of my Will or to the validity of any disposition or provision of my Will or of the Trust or (b) institute or prosecute, or be in any way directly or indirectly instrumental in the institution or prosecution of, any action, proceeding, contest, objection or claim for the purpose of setting aside or invalidating my Will or the Trust or any disposition therein or provision thereof, then I direct that (a) any and all provisions in the Trust for such beneficiary and his issue in any degree shall be null and void and (b) my estate, whether passing under my Will or the Trust or pursuant to the laws of intestacy, shall be disposed of as if such beneficiary and his issue in any degree had all failed to survive me.

7: A. As used herein:

(1) The term "Executor" of a person's estate means all persons or entities who occupy the office of executor, administrator, personal representative, or ancillary administrator while such persons or entities occupy such office, whether one or more persons or entities occupy such office at the same time or times, and includes any

successor or successors to that office. The term "Trustee" means all persons or entities who occupy the office of Trustee under the Trust Agreement while such persons or entities occupy such office, whether one or more persons or entities occupy the office of Trustee at the same time or times, and includes any successor Trustee or Trustees. A reference to a person's estate or probate estate means that person's estate which is subject to probate administration. A reference to a person's Will means such person's Last Will and Testament and any Codicil or Codicils thereto.

(2) The term "IRC section" means a section of the Internal Revenue Code of 1986, as amended, or the corresponding provision of any successor Internal Revenue law, as in effect as of the date of my death.

(3) A reference to any tax also includes any interest or penalties thereon. A reference to a person's "Gross Estate" means such person's gross estate as finally determined for purposes of computing such person's federal estate tax.

(4) Whenever the singular number is used, the same shall include the plural, and the masculine gender shall include the feminine and neuter genders.

B. The federal and state transfer taxes which my Executor shall be obligated to pay pursuant to Paragraph B of Article FIRST shall consist of all federal and state estate, inheritance, succession, and similar taxes (including any federal or state generation-skipping transfer tax) imposed upon my probate estate or by reason of my death in respect to all assets which pass under this Will or the Trust Agreement. Subject to Paragraph B(2) of this Article, all federal estate taxes with respect to assets not passing under this Will or the Trust Agreement (such assets are referred to as the "Apportionment Assets") and any applicable state estate taxes with respect to the Apportionment Assets shall be apportioned among all persons interested in the Apportionment Assets. My Executor shall make reasonable efforts to collect all federal estate taxes and state estate, inheritance, succession and similar taxes allocable to the Apportionment Assets from the recipients of the Apportionment Assets. Without changing the apportionment of taxes in this Paragraph B(1), my Executor has discretion, but is not required, to pay all or part of such taxes allocable to the Apportionment Assets. To the extent my Executor pays such taxes allocable to the Apportionment Assets, my Executor shall seek reimbursement for such taxes from the recipients of the Apportionment Assets. My Executor shall not be personally liable for any of such taxes if my Executor is unable, with reasonable efforts, to collect payment (or reimbursement) from any recipient of any Apportionment Assets for any or all of such taxes allocable to such assets.

(1) My Executor has discretion to direct the Trustee of the Trust Agreement to pay all or any portion of the taxes which my Executor is directed or obligated to pay pursuant to Paragraph B of Article FIRST and this Paragraph B pursuant to a written direction delivered to the Trustee under the Trust Agreement. Any taxes which my Executor directs the Trustee under the Trust Agreement to pay shall be allocated and paid from the trusts under the Trust Agreement as provided under the Trust Agreement.

C. Except as otherwise specifically provided in this Will, a bequest or devise to an individual who does not survive me shall lapse notwithstanding any law to the contrary.

D. To the extent that the distribution to the Trustee under the Trust Agreement pursuant to Article SECOND shall not be effective, I give all the rest of my property, real and personal, wherever situated, after the payments and distributions provided in Article FIRST, to the person or persons named as Trustee or Trustees under the Trust Agreement, to be held in trust under this Will in accordance with the provisions comprising the Trust Agreement at the time of my death, which provisions are incorporated in this Will by reference.

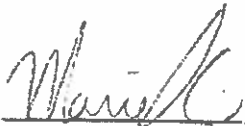
2019.

IN WITNESS WHEREOF, I have duly executed this Will this 8th day of August,



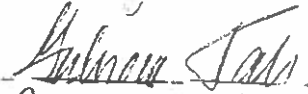
JEFFREY E. EPSTEIN

The foregoing instrument, consisting of eleven (11) pages, was signed in our presence by Jeffrey E. Epstein and was declared by him to be his last Will. We, at the request of and in the presence of Jeffrey E. Epstein and in the presence of each other, have subscribed our names below as witnesses. We declare that we are of sound mind and of the proper age to witness a will, that to the best of our knowledge the testator is of the age of majority, or is otherwise legally competent to make a will, and appears of sound mind and under no undue influence or constraint. Under penalty of perjury, we declare these statements are true and correct on this 8th day of August, 2019 at New York, New York.



residing at

Mariela Colón Miró



residing at

GULNORA TALI

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

19 JUN 15 PM 03:10
SUPERIOR COURT
ST. THOMAS AND ST. JOHN

IN THE MATTER OF THE ESTATE OF)
JEFFREY E. EPSTEIN) PROBATE NO. ST-19-PB-____
)
Deceased.) ACTION FOR TESTATE
ADMINISTRATION

OATH OF WILLINGNESS TO SERVE AS EXECUTOR AND
APPOINTMENT OF LOCAL COUNSEL

I, Darren K. Indyke, hereby declare, certify, verify, and state under penalty of perjury under the laws of the United States Virgin Islands that:

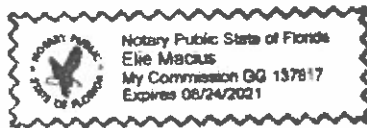
1. I am an adult of sound mind, have never been convicted of any felony or of a misdemeanor involving moral turpitude, and I am not a judicial officer.
2. I am a resident of Florida.
3. The Last Will and Testament of Jeffrey E. Epstein nominates and appoints me as an Executor of the Estate of Jeffrey E. Epstein, deceased.
4. I am willing to act as Executor of the above-captioned Estate according to the law and to the best of my ability and I will faithfully discharge the duties and obligations of Executor
5. I will render a true accounting of all monies and property coming into my possession for which I am responsible.
6. I am willing to act as Executor of the above-captioned Estate and request that the Court act upon and grant all the prayers of the Petition for Probate.
7. I am a non-resident of the Virgin Islands, and thus, I appoint the law office of KELLERHALS FERGUSON KROBLIN PLLC, located in the Virgin Islands, specifically at Royal Palms Professional Building, 9053 Estate Thomas, Suite 101, St. Thomas, VI 00802, as my attorney upon whom service of all papers may be made.

Darren K. Indyke

SUBSCRIBED AND SWORN to before

me this 15 day of August, 2019.

NOTARY



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-____

ACTION FOR TESTATE
ADMINISTRATION

OATH OF WILLINGNESS TO SERVE AS EXECUTOR AND
APPOINTMENT OF LOCAL COUNSEL

I, Richard D. Kahn, hereby declare, certify, verify, and state under penalty of perjury under the laws of the United States Virgin Islands that:

1. I am an adult of sound mind, have never been convicted of any felony or of a misdemeanor involving moral turpitude, and I am not a judicial officer.
2. I am a resident of New York, New York.
3. The Last Will and Testament of Jeffrey E. Epstein nominates and appoints me as an Executor of the Estate of Jeffrey E. Epstein, deceased.
4. I am willing to act as Executor of the above-captioned Estate according to the law and to the best of my ability and I will faithfully discharge the duties and obligations of Executor.
5. I will render a true accounting of all monies and property coming into my possession for which I am responsible.
6. I am willing to act as Executor of the above-captioned Estate and request that the Court act upon and grant all the prayers of the Petition for Probate.
7. I am a non-resident of the Virgin Islands, and thus, I appoint the law office of KELLERHALS FERGUSON KROBLIN PLLC, located in the Virgin Islands, specifically at Royal Palms Professional Building, 9053 Estate Thomas, Suite 101, St. Thomas, VI 00802, as my attorney upon whom service of all papers may be made.

Richard D. Kahn

Richard D. Kahn

SUBSCRIBED AND SWORN to before

me this 15th day of August, 2019.

Marianne Barnett
NOTARY

MARIANNE BARNETT
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01BA6276845
Qualified in Suffolk County
Term expires February 25, 2021

19 AUG 15 PM 6:16

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-_____

ACTION FOR TESTATE
ADMINISTRATION

PETITION FOR PROBATE AND FOR LETTERS TESTAMENTARY

COME NOW Petitioners **DARREN K. INDYKE** and **RICHARD D. KAHN**, Executors of the Estate of Jeffrey E. Epstein, by and through **KELLERFLAIS FERGUSON KROBLIN PLLC**, and petition this Honorable Court to grant the instant petition pursuant to V.I. CODE ANN. tit. 15, § 161 and Rule 3 of the Virgin Islands Rules for Probate and Fiduciary Proceedings. In support thereof, Petitioners state the following:

- 1) That Petitioners Darren K. Indyke and Richard D. Kahn ("Petitioners") are citizens of the United States of America and residents of Florida and New York, respectively.
- 2) The original Last Will and Testament of Decedent, dated August 8, 2019, which is attached hereto, appoints Petitioners as Executors of the Estate.
- 3) The Decedent, Jeffrey E. Epstein, died testate on August 10, 2019 in New York, New York, and was domiciled in and a resident of St. Thomas, Virgin Islands at the time of his death, as supported by the copy of Certificate of Death attached hereto.¹
- 4) Decedent left certain assets in trust.
- 5) The Decedent died possessed of certain property within the Territory of the U.S. Virgin Islands and within the jurisdiction of the Court as herein described:

¹ The original death certificate, or a certified copy thereof, will be filed with the Court upon Counsel's receipt of the same.

<u>PERSONAL PROPERTY</u>	<u>VALUE</u>
Cash	\$ 56,547,773.00
Fixed Income Investments	\$ 14,304,679.00
Equities	\$ 112,679,138.00
Aviation Assets, Automobiles and Boats	\$ 18,551,700.00
Fine Arts, Antiques, Collectibles, Valuables & Other Personal Property	TBD subject to appraisal/valuation
Hedge Funds & Private Equity Investments	\$ 194,986,301.00
10,000 shares of Maple, Inc., a U.S. Virgin Islands corporation which holds title to 9 East 71 st Street New York, NY 10021	\$ 55,931,000.00
10,000 shares of Cypress, Inc., a U.S. Virgin Islands Corporation, which holds title to 49 Zorro Ranch Road Stanley, New Mexico 87056	\$ 17,246,208.00
10,000 shares of Laurel, Inc., a U.S. Virgin Islands Corporation, which holds title to 358 El Brillo Way Palm Beach, Florida 33480	\$ 12,380,209.00
999 shares of SCI JEP, a French Company which holds title to units 47 with mezzanine, 48 and 81 on the 2nd floor, units 63 and 74 on the 5 th floor and units 5 and 22 (cellars) in the basement 22 Avenue Foch Paris, France 75116	\$ 8,672,823.00
10,000 shares of Poplar, Inc., a U.S. Virgin Islands Corporation, which holds title to Great St. James Island No. 6A Red Hook Quarter St. Thomas, Virgin Islands	\$ 22,498,600.00
10,000 shares of Nautilus, Inc., a U.S. Virgin Islands Corporation, which holds title to Little St. James Island No. 6B Red Hook Quarter Parcels A, B & C St. Thomas, Virgin Islands	\$ 63,874,223.00
TOTAL PERSONAL PROPERTY:	\$ 577,672,654.00
TOTAL ESTATE PROPERTY:	\$ 577,672,654.00

² Values are subject to appraisal and/or update to their date of death valuation, which will be confirmed in verified inventory to be filed with the Court.

- 6) Petitioners are investigating potential debts and claims of the Estate and at this time they are unknown.
- 7) That the names and addresses, insofar as known to Petitioners, of the heirs and next of kin of the deceased, who would be entitled to share the estate if he had left no will; the relation of each such person to him; the proportion due each such person, and whether each of them is an adult or an infant are as follows:

<u>NAMES</u>	<u>RELATIONSHIP</u>	<u>CAPACITY</u>	<u>SHARE</u>
Mark Epstein	Brother	Adult	100%


- 8) That Petitioners Darren K. Indyke and Richard D. Kahn be appointed Executors. They are adults of sound mind, are not convicted of any crime involving moral turpitude, and are not judicial officers of this Honorable Court.
- 9) Although Petitioners are not residents of the Virgin Islands, they are qualified to serve as Executors pursuant to 15 V.I.C. § 235(c) because they otherwise qualify under 15 V.I.C. § 235(a) and they have appointed the law firm of Kellerhals Ferguson Kroblin PLLC, which has offices on St. Thomas, Virgin Islands, to accept service of all papers for purposes of the probate of Decedent's estate.
- 10) The Decedent's Last Will and Testament provides that "No bond or other security shall be required of any Executor in any jurisdiction." See original Last Will and Testament attached hereto at Article THIRD, subsection B on page 2. Accordingly, Petitioners pray that the bond be waived pursuant to V.I. R. Prob. 3.

WHEREFORE, Petitioners pray:

- A. That the Estate of Jeffrey E. Epstein be entered into Probate;
- B. That a citation be issued to any heir or next of kin who has not signed a Waiver;
- C. That this Honorable Court order the issuance of a notice to creditors and claims procedure order in substantial form of that which will be separately proposed to the court forthwith;
- D. That the Last Will and Testament of Jeffrey E. Epstein, attached hereto, be admitted to Probate;
- E. That Darren K. Indyke and Richard D. Kahn be appointed Executors and Letters Testamentary be issued to them;
- F. That the bond be waived; and
- G. That the Petition be granted.

Respectfully,

DATED: August 15, 2019


WILLIAM BLUM, ESQ., Of Counsel
V.I. Bar No. 136
KELLERHALS FERGUSON KROBLIN PLLC
Royal Palms Professional Building
9053 Estate Thomas, Suite 101
St. Thomas, V.I. 00802-3602
Telephone: (340) 779-2564
Facsimile: (888) 316-9269
Email: wblum@solblum.com

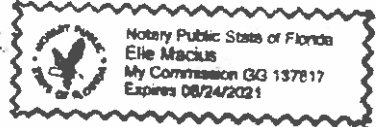
VERIFICATION OF PETITION

I, Darren K. Indyke, Executor of the Last Will and Testament of Jeffrey E. Epstein, hereby verify I have read and do hereby certify that the statements contained in the Petition for Probate and for Letters Testamentary are accurate in so far as my knowledge and insofar as my own records show.

DATED: August 5, 2019

[Signature]
Darren K. Indyke

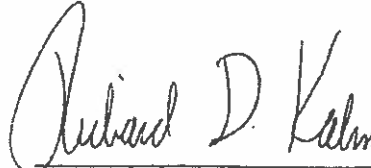
SUBSCRIBED AND SWORN to before me
this 5 day of August, 2019.



VERIFICATION OF PETITION

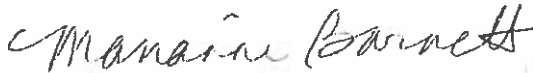
I, Richard D. Kahn, Executor of the Last Will and Testament of Jeffrey E. Epstein, hereby verify I have read and do hereby certify that the statements contained in the Petition for Probate and for Letters Testamentary are accurate in so far as my knowledge and insofar as my own records show.

DATED: August 15th, 2019



Richard D. Kahn

SUBSCRIBED AND SWORN to before me
this 15th day of August, 2019.



MARIANNE BARNETT
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01BA6276845
Qualified in Suffolk County
Term expires February 25, 2021

EXHIBIT

2

THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK - DEPARTMENT OF HEALTH AND MENTAL HYGIENE

AUG-11-2019 07:36 PM

CERTIFICATE OF DEATH

Certificate No. 156-19-032838

SUPERIOR COURT
 THE VICE-CHIEF CLERK
 19 AUG 15 2019 PM 4:10

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD EPSTEIN**
 (First, Middle, Last)

Place of Death Manhattan	2a. New York City 2b. Borough	3a. Type of Place 1 <input type="checkbox"/> Hospital Inpatient 2 <input checked="" type="checkbox"/> Emergency Dept./Outpatient 3 <input type="checkbox"/> Dead on Arrival	4 <input type="checkbox"/> Nursing Home/Long Term Care Facility 5 <input type="checkbox"/> Hospice Facility 6 <input type="checkbox"/> Decedent's Residence 7 <input type="checkbox"/> Other Specify	2d. Any Hospice care in last 30 days 1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No 3 <input type="checkbox"/> Unknown	2e. Name of hospital or other facility (if not facility, street address) New York-Presbyterian-Lower Manhattan Hospital
Date and Time of Death or Found Dead August 10 2019 7:36	3b. (Month) (Day) (Year-yyyy)	2b. Time <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	4. Sex Male	5. OCME Case No. M19019432	
5. CAUSE OF DEATH PART I a. Immediate cause Pending Further Study b. Due to or as a consequence of c. Due to or as a consequence of Other significant conditions contributing to death but not resulting in the underlying cause given in Part I. Include operation information.					
7a. Injury Date (mm dd yyyy) ***					
7b. Time <input type="checkbox"/> AM <input type="checkbox"/> PM					
7c. At Work <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
7d. Place of Injury - if home, specify street no.					
7e. Location					
7f. Hour Injury Occurred					
7g. If Transportation Injury Specify <input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify					
8. Manner of Death <input checked="" type="checkbox"/> Pending further inquiry <input type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Unintentional					
9. Autopsy <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Autopsy Performed at Law <input type="checkbox"/> No Autopsy					
10. On the basis of examination and/or investigation, in my opinion, death occurred due to the disease and condition stated above. Physician Signature: <i>Paula Stokofsky</i> Medical Examiner: KRISTIN ROMAN Medical Examiner, County Clerk (State Judicial Examiner)					
11a. Usual Residence State US Virgin Islands					
11b. County St. Thomas					
11c. City or Town St. Thomas					
11d. Block or Precinct Little Saint James Island					
11e. Inside City Limits? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
12. Date of Birth (Month) (Day) (Year-yyyy) January 20 1953					
13. Age at last birthday (years) 66					
14. Usual Occupation (Type of work done during most of working life) Consultant					
15a. Usual Occupation (Type of work done during most of working life) Finance					
15b. Kind of business or profession					
15c. Address of OCA#					
17. Birthplace (City & State or Foreign Country) Brooklyn, New York					
18. Education (Check the box that best describes the highest degree or level of postsecondary education of the time of death) <input type="checkbox"/> No graduate work <input type="checkbox"/> Some college (less than 2 years) <input type="checkbox"/> Bachelor's degree or OED <input type="checkbox"/> Master's degree (e.g., M.A., M.S.) <input type="checkbox"/> Doctoral degree (e.g., Ph.D., M.D.)					
19. Ever in U.S. Armed Forces? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
20. Marital Partnership Status at time of death <input type="checkbox"/> Married <input type="checkbox"/> Domestic Partnership <input checked="" type="checkbox"/> Married, but separated <input type="checkbox"/> Never married <input type="checkbox"/> Widowed <input type="checkbox"/> Divorced					
21. Spouse's Name (Last name prior to first marriage) (First, Middle, Last) Paula Stokofsky					
22. Father's Name (First, Middle, Last) Seymour Epstein					
23. Mother's Name (First, Middle, Last) Paula Stokofsky					
24a. Informant's Name Mark Epstein					
24b. Relationship to Decedent Brother					
24c. City & State NY					
24d. ZIP Code 33411-8219					
25a. Method of Disposition <input type="checkbox"/> Burial <input type="checkbox"/> Cremation <input type="checkbox"/> Entombment <input type="checkbox"/> City Cemetery <input type="checkbox"/> Other Specify					
25b. Place of Disposition (Name of cemetery, crematory, other place)					
25c. Location of Disposition (City & State or Foreign Country)					
25d. Date of Disposition 08 13 2019					
26a. Funeral Establishment					
26b. Address (Street and Number) City & State ZIP Code 1076 Madison Ave New York, NY 10028-0237					
No Correction History ***					

EVT201908377126

Stephan Vertwe
 Gretchen Van Wye, Ph.D., City Registrar as of 8/1/18

August 11, 2019

VR 18 (Rev. 01/08)

This is to certify that the foregoing is a true copy of a record on file in the Department of Health and Mental Hygiene. The Department of Health and Mental Hygiene does not certify to the truth of the statements made thereon, as no inquiry as to the facts has been provided by law.

Steven P. Schwartz
 Steven P. Schwartz, Ph.D., City Registrar

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Y01383215



THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK - DEPARTMENT OF HEALTH AND MENTAL HYGIENE
 AUG-11-2019 07:36 PM **CERTIFICATE OF DEATH** Certificate No. 156-19-032838

SUPERIOR COURT
 THE NINETEENTH JUDICIAL DISTRICT
 19 AUG 15 PM 11:10

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD EPSTEIN**
 (First, Middle, Last)

2a. New York City 2b. Borough Manhattan		2c. Type of Place 1 <input type="checkbox"/> Hospital Inpatient 2 <input checked="" type="checkbox"/> Emergency Dept./Outpatient 3 <input type="checkbox"/> Dead on Arrival 4 <input type="checkbox"/> Nursing Home/Long Term Care Facility 5 <input type="checkbox"/> Hospice Facility 6 <input type="checkbox"/> Decedent's Residence 7 <input type="checkbox"/> Other Specify _____		2d. Any Hospital care in last 30 days 1 <input type="checkbox"/> Yes 2 <input type="checkbox"/> No 3 <input type="checkbox"/> Unknown		2e. Name of hospital or other facility (if not facility, street address) New York-Presbyterian-Lower Manhattan Hospital		
Date and Time of Death or Found Dead		3a. (Month) August	3b. (Day) 10	3c. (Year-yyyy) 2019	3d. Time 7:36	3e. AM <input type="checkbox"/> AM <input type="checkbox"/> PM	3f. Sex Male	5. OCME Case No. M19019432
6. C A R T I PART I PART II		a. Immediate cause Pending Further Study						7. Other significant conditions contributing to death but not resulting in the underlying cause given in Part I. Include operation information.
		b. Due to or as a consequence of						
		c. Due to or as a consequence of						
7a. Injury Date (mm dd yyyy)		7b. Time <input type="checkbox"/> AM <input type="checkbox"/> PM	7c. At Work <input type="checkbox"/> Yes <input type="checkbox"/> No	7d. Place of Injury		7e. Location		
7g. If Transportation Injury Specify <input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify _____		8. Manner of Death a. Pending further study b. Natural <input type="checkbox"/> Nonnatural <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Undetermined		9. Autopsy <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No autopsy performed		10. On the basis of examination and other information, in my opinion, death occurred due to Cardiac Arrest D.D. M.D. Date AUG-11-2019 KEVIN E. DOMAN Medical Examiner Medical Examiner, County of New York (Chief Medical Examiner)		
11a. Usual Residence State US Virgin Islands	11b. County St. Thomas	11c. City or Town St. Thomas		11d. State of Birth St. Vincent and the Grenadines	11e. ZIP Code 00802	11f. Is the City/State? <input type="checkbox"/> Yes <input type="checkbox"/> No		
12. Date of Birth (Month) (Day) (Year-yyyy) January 20 1953		13. Age at last birthday (years) 66		14. Social Security No. ████████-████-3348				
15a. Usual Occupation (Type of work done during life of decedent) Consultant		15b. Kind of business or industry Finance		15c. Industry of SICs				
17. Birthplace (City & State or Foreign Country) Brooklyn, New York		18. Education (Check the box that best describes the highest degree or level of schooling completed at the time of death) 1 <input type="checkbox"/> No schooling beyond high school 2 <input type="checkbox"/> High school graduate, no diploma 3 <input type="checkbox"/> High school diploma or GED 4 <input type="checkbox"/> Bachelor's degree (e.g., BA, BS) 5 <input type="checkbox"/> Some college credit, but no degree 6 <input type="checkbox"/> Master's degree (e.g., MA, MS, MEd, MEd, MEd, MEd) 7 <input type="checkbox"/> Doctoral degree (e.g., PhD, EdD) or Professional degree (e.g., MD, DDS, DVM, LL.M., JD)						
19. Ever in U.S. Armed Forces? 1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No		20. Marital Partnership Status at time of death 1 <input type="checkbox"/> Married 2 <input type="checkbox"/> Domestic Partnership 3 <input type="checkbox"/> Divorced 4 <input type="checkbox"/> Married, but separated 5 <input type="checkbox"/> Never Married 6 <input type="checkbox"/> Widowed		21. Spouse's Name (Last, First, Middle, Last) Paula Stojfky				
22. Father's Name (First, Middle, Last) Seymour Epstein		23. Informant's Name (Last, First, Middle, Last) Mark Epstein						
24a. Informant's Name Mark Epstein		24b. Relationship to Decedent Brother		24c. City & State NY NY		24d. ZIP Code 33411-6218		
25a. Method of Disposition 1 <input type="checkbox"/> Burial 2 <input type="checkbox"/> Cremation 3 <input checked="" type="checkbox"/> Entombment 4 <input type="checkbox"/> City Cemetery 5 <input type="checkbox"/> Other Specify _____		25b. Place of Disposition (Name of cemetery, crematory, other place)						
25c. Location of Disposition (City & State or Foreign Country)		25d. Date of Disposition mm dd yyyy 08 13 2019						
25e. Funeral Establishment		25f. Address (Street and Number) City & State ZIP Code 1076 Madison Ave New York, NY 10028-0237						
No Correction History **								

EVT20190837726

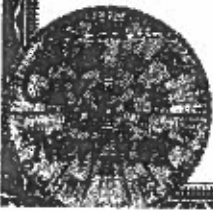
Kathleen Van Wye
 Kathleen Van Wye, Ph.D., City Registrar as of 8/1/10

August 11, 2019
Steven P. Schwartz
 Steven P. Schwartz, Ph.D., City Registrar

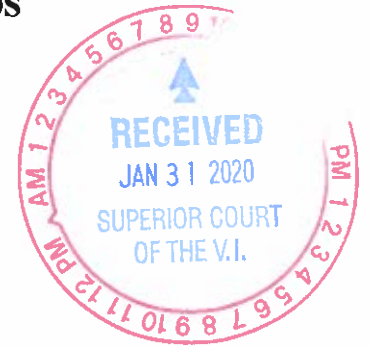
This is to certify that the foregoing is a true copy of a record on file in the Department of Health and Mental Hygiene. The Department of Health and Mental Hygiene does not certify to the truth of the statements made thereon, as no inquiry as to the facts has been provided by law.

Do not accept this transcript unless it bears the security features listed on the back. Reproduction or alteration of this transcript is prohibited by §3.19(b) of the New York City Health Code if the purpose is the evasion or violation of any provision of the Health Code or any other law.

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



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

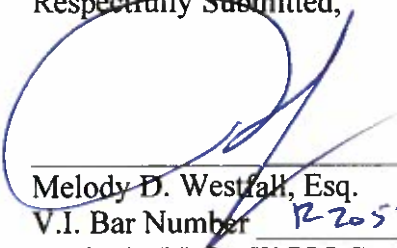
Case No. ST-19-PB-80

Notice of Filing of Motion to Proceed Anonymously
in Filing a Notice of Claim for Unliquidated and Unsecured Damages

COME NOW, the undersigned counsel, on behalf of Claimant Jane Doe III, a victim of the Estate of Jeffrey E. Epstein, and submit for the consideration of the Court, the attached Motion to Proceed Anonymously in Filing a Notice of Claim for Unliquidated and Unsecured Damages.

Dated: Christiansted, St. Croix
January 3, 2020

Respectfully Submitted,



Melody D. Westfall, Esq.
V.I. Bar Number R2052
WESTFALL LAW PLLC
5032 Anchor Way, Suite 8
Christiansted, St. Croix 00820
mwestfall@westfalllaw.com
(340) 227-0017
Attorneys for Claimant Jane Doe III

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

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

Case No. ST-19-PB-80



**Motion to Proceed Anonymously in Filing a
Claim for Unliquidated and Unsecured Damages**

COME NOW, the undersigned counsel, on behalf of Claimant Jane Doe III (“Claimant”), a victim of the Estate of Jeffrey E. Epstein (the “Estate”), and file this Motion to Proceed Anonymously in Filing a Notice of Claim for Unliquidated and Unsecured Damages, and in support thereof state:

1. This motion and the subsequent notice of claim are timely and properly filed pursuant to Virgin Islands Probate and Fiduciary Rule 11 titled Notice to Creditors and Persons Indebted to the Estate which notes that "...all persons having claims against the estate [are] to present, or deliver to the executor or administrator, their claim(s), verified by affidavit, to a place within the territory specific in the notice, within six months from the date of notice..." as such a notice was dated September 13, 2019, filed on September 18, 2019 and directed such claims to be presented to the offices of their attorneys or the Clerk of this Court. See also 15 V.I.C. § 391 Publication of Notice of Administration.

2. The undersigned currently represents twelve victims, including Claimant, who has a claim to be made against the Estate of Jeffrey E. Epstein. On December 3, 2019, nine of those twelve victims, including Claimant, filed suit against the above-referenced Estate and its executors in the Supreme Court of the State of New York, County of New York. See Jane Doe I et al v.

Darren K. Indyke et al (Index No.: 950230/2019) (Hon. George J. Silver, J.S.C.). A true and correct copy of the Summons and Verified Complaint are attached hereto as Exhibit "1".

3. It is important to note that in that complaint, Claimant filed anonymously using the "Jane Doe" pseudonym.

4. Furthermore, on December 5, 2019, Bennet J. Moskowitz of Troutman Sanders LLP, attorneys for the executors of the Estate, filed a stipulation with request to so order Claimant's requests for anonymity on consent from all parties involved in that litigation. Attached hereto as Exhibit "2" is a true and correct of the fully executed stipulation.

5. The only reason that this stipulation has not been so ordered at this time is due to the current Administrative Stay placed on the case, and all other cases of similar nature, pending in the Supreme Court. Attached hereto as Exhibit "3" is a true and correct copy of the Administrative Order of Hon. George J. Silver, J.S.C.

6. Accordingly, the undersigned respectfully requests that this Court also grant Claimant the ability to present her Notice of Claim anonymously under pseudonym.

7. If the fact that both of the parties in this proceeding have already agreed for Claimant to file anonymously is not persuasive enough, courts in this Circuit have also granted such relief even when it is opposed.

8. First and foremost, this sort of decision is within the direct purview of this Court. See Doe v. C.A.R.S. Protection Plus, Inc., 527 F.3d 358, 371 (3rd Cir. 2008) ("[T]he decision whether to allow a [claimant] to proceed anonymously rests within the sound discretion of the court.").

9. Indeed, in making such decisions, courts in this circuit have continually applied a balancing test type approach using several factors outlined by the Third Circuit in the case of Doe

v. Megless and its progeny. See Doe v. Megless, 654 F.3d 404 (3rd Cir. 2011) (“Megless”); see also D.M. v. Cty. of Berks, 929 F. Supp. 2d 390 (E.D. Pa. 2013) (“Berks”); Doe v. Rutgers, 2019 U.S. Dist. LEXIS 75139 (D.N.J. 2019) (“Rutgers”).

10. In this case, it is clear that when applying the nine Megless factors (six that favor anonymity and three that disfavor anonymity), an overwhelming majority of them support Claimant’s use of a pseudonym while the few that do not are either not applicable to the case or do not do enough to tip the scales. See Megless, 654 F.3d at 409.

11. Regarding the first factor in favor of anonymity, the facts of this case stand in sharp contrast to instances where courts have found that anonymity would be futile because the movant’s name was already widely known. See Rutgers at 5-6 (citing to Megless at 410 ([movant’s] name, picture and home address had been disclosed on a publicly circulated flyer)). Here, the facts align more with Rutgers as Claimant has gone above and beyond to maintain her confidentiality, which has never been made public, including by filing her lawsuit as a “Jane Doe” and stipulating with the Estate to the same. See Megless at 410; see also Rutgers, 2019 U.S. Dist. LEXIS 75139 at 5.

12. Second, as for the reasonableness of the harm that the litigant is seeking to avoid, here, similar to the facts of Rutgers, Claimant wishes to proceed anonymously in order to protect her mental and physical health and right to fully and fairly litigate this action. See Rutgers at 6-7; see also Doe v. Roman Catholic Archdiocese of New York, 64 Misc. 3d 1220(A) (Sup Ct., Westchester Cty. 2019).

13. Indeed, as opposed to using a pseudonym merely to avoid the annoyance and criticism that may attend any litigation, Claimant seeks to proceed anonymously to preserve her privacy in this matter of a sensitive and highly personal nature that will have a lifelong impact on her and her families’ lives. See Rutgers at 6-7; see also Doe v. Szul Jewelry Inc., 2008 NY Misc.

LEXIS 8733 (Sup. Ct., New York Cty. 2008); Doe v. New York Univ., 6 Misc. 3d 866 (Sup. Ct., New York Cty. 2004); Sealed Plaintiff v. Sealed Defendant, 537 F.3d 185 (2nd Cir. 2008).

14. Third, unlike Megless where the District Court recognized that there is no allegation that falsely create suspicious person alert are a widespread problem, here the facts are more similar to Berks in that disallowing anonymity would likely deter those who have been falsely accused of sexual abuse from vindicating their rights due to the stigma that invariably attaches from having one's name publicly attached to such a deplorable act. See Megless at 410; see also Berks, 929 F. Supp. 2d at 402.

15. Fourth, similar to Rutgers, there is a strong chance that this claim will not be resolved on its merits if the litigant is denied the opportunity to proceed using a pseudonym as Claimant will potentially sacrifice a potentially valid claim simply to preserve her anonymity. See Rutgers at 7-8. The Court here should decide in conformity with the court in Rutgers where they agreed with the movant's argument that the public is harmed when alleged abuse goes unchallenged because movant's fear litigating publicly. See id.

16. As for the final factor weighing in favor of anonymity, Claimant is not seeking to use a pseudonym for nefarious reasons, nor has there been any allegations that Claimant has an illegal or ulterior motive in her desire to hide her name. See Megless at 411; see also Rutgers at 10. As opposed to simple public humiliation and embarrassment, which have been determined not to be sufficient grounds for allowing a Claimant to proceed anonymously, in this case, there is no "illegitimate ulterior motive", because, as referenced above, identification of Claimant's true identity "poses a risk of mental or physical harm" and the case involves "information of the utmost intimacy". See Megless at 411; see also Rutgers at 10; Doe, 2008 NY Misc. LEXIS at 16-17; Doe, 6 Misc. 3d at 879; Sealed Plaintiff, 537 F.3d at 189-190; 1991 McKinney's Session Laws of New

York 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").

17. Furthermore, even when turning to the other side of the scale and the factors disfavoring anonymity, Claimant still comes out ahead.

18. While Claimant acknowledges that there is a thumb on the scale that is the universal interest in favor of open judicial proceedings, she is not asking the record to be sealed, rather simply to proceed anonymously.

19. Next, the Court must consider "whether, because of the subject matter of this litigation, the status of a litigant as a public figure, or otherwise, there is a particularly strong interest in knowing the litigant's identities." See Megless at 411; see also Rutgers at 12. Here, the Claimant is not a public figure.

20. This litigation also involves "a member of a particularly vulnerable class" or "the subject matter is highly personal," the "public has an interest in protecting the identity of the litigant." See Rutgers at 12 (citing to Doe v. Rider Univ., 2018 U.S. Dist. LEXIS 133146 (D.N.J. 2018)). Here, Claimant alleges that she is a victim of sexual assault, so allowing her to proceed as a "Jane Doe" while preserving the public's right to access the docket and proceedings in this case strikes the appropriate balance between these competing interests. See Rutgers at 12 (citing to L.A. v. Hoffman, 2015 U.S. Dist. LEXIS 94564 (D.N.J. 2015) (granting [movant's] motion to proceed anonymously and observing that "although the identities of the [movants] will not be included in the filings in this matter, the public will maintain access to the docket and filings in this case.")).

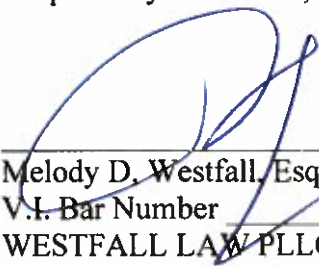
21. Finally, the last factor weighing against disclosure is not applicable as there is no party opposing the use of a pseudonym.

22. Applying the factors referenced in the litany of case law to the specific facts of Ms. Claimant's case makes clear that she should be permitted to proceed pseudonymously. She is a victim of sexual abuse, a matter of a highly sensitive and personal nature; she is not seeking to avoid mere embarrassment, but rather to protect her physical and mental well-being along; it is well known that victims of sexual crimes are often not believed and have their reputations are put into question, thus identification of her poses a serious risk of retaliatory harm to her; and, the Estate will not be prejudiced because her identity will be known to it and their counsel, and thus they will be able to properly investigate her claim. As such, the Court here should find that the totality of the factors and circumstances favor anonymity.

WHEREFORE, Claimant prays that the Court grant (a) her motion seeking the right to proceeding in this action under pseudonym in its entirety; and, (c) all other further relief as this Court may deem just and proper.

Dated: Christiansted, St. Croix
January 31, 2020

Respectfully Submitted,



Melody D. Westfall, Esq.
V.I. Bar Number R 2052
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Christiansted, St. Croix 00820
mwestfall@westfalllaw.com
(340) 227-0017
Attorneys for Claimant Jane Doe III

CERTIFICATE OF SERVICE

I hereby certify that on January 9/, 2020, I caused a true and correct copy of the foregoing Motion to Proceed Anonymously in Filing a Claim for Unliquidated and Unsecure Damages to be served on the following:

William Blum, Esq.
KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Darren K. Indyke, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Richard Kahn, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
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Douglas B. Chanco, Esq.
CHANCO SCHIFFER LAW, LLC
9053 Sugar Estate, Suite 103
St. Thomas, USVI 00802

A. Jeffrey Weiss, Esq.
A.J. WEISS & ASSOCIATES
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St. Thomas, USVI 00802

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Robert V. Goldsmith III, Esq.
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Richard P. Bourne-Vanneck, Esq.
RICHARD P. BOURNE-VANNECK, P.C. d/b/a
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P.O. Box 11720
St. Thomas, USVI 00801

EXHIBIT

1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.: _____/19

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,

Plaintiffs designate
NEW YORK COUNTY
as place of trial.

Plaintiffs,

The basis of venue is the
location where a
substantial part of the
events or omissions giving
rise to these claims
occurred, the residence of
at least one plaintiff and
the residence of defendant
Kahn

-against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

SUMMONS

Defendants.

Plaintiffs reside in New
York and other States

-----X
To the above-named defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York) and in case your failure to appear or answer, judgement will be taken for the relief demanded herein.

A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT, NEW YORK COUNTY ON 12/3/19 IN COMPLIANCE WITH CPLR §§305(a) AND 306(a).

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: 

Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

Defendants' Addresses:

**RICHARD D. KAHN, in his capacity as a co-executor
of the ESTATE OF JEFFREY EDWARD EPSTEIN**
130 East 75th Street
New York, NY 10021

**DARREN K. INDYKE, in his capacity as a co-executor
of the ESTATE OF JEFFREY EDWARD EPSTEIN**
6030 Le Lac Road
Boca Raton, FL 33496

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE
DOE IV, JANE DOE V, JANE DOE VI, JANE DOE
VII, JANE DOE VIII and JANE DOE IX,

Index No.: _____/19

Plaintiffs,

-against -

**VERIFIED
COMPLAINT**

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the ESTATE OF
JEFFREY EDWARD EPSTEIN,

Defendants.

-----X
COMPLAINT AND JURY TRIAL DEMANDED

Plaintiffs JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV, JANE DOE
V, JANE DOE VI, JANE DOE VII, JANE DOE VIII and JANE DOE IX, by and through
their counsel at MERSON LAW, PLLC, and as for their complaint in this action against
defendants DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the
executors of the ESTATE OF JEFFREY EDWARD EPSTEIN, hereby allege the following:

NATURE OF THE CLAIMS

1. Jeffrey Edward Epstein (hereinafter, "Epstein") sexually abused, assaulted and battered many women and children, including the plaintiffs herein.
2. These nine women come forward to stand up for themselves and others, after they were sexually abused and assaulted by Epstein.
3. Some of these women were raped by Epstein, repeatedly.
4. All of these women were sexually battered, assaulted, and abused by Epstein as a part of the same conduct, occurrence, plan, scheme and transaction that was perpetrated.

26. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe III suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

27. Starting in or about 2001 and continuing for a period of time thereafter, when plaintiff Jane Doe IV was approximately fifteen-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

28. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe IV suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

29. Starting in or about 2004 and continuing for a period of time thereafter, when plaintiff Jane Doe V was nineteen-years-old, Epstein sexually assaulted, abused, battered and forced her to perform oral sex on him.

30. As a result of the aforementioned sexual assault, abuse, battery and forced oral sex, plaintiff Jane Doe V suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

31. Starting in or about 2001 and continuing for a period of time thereafter, when plaintiff Jane Doe VI was nineteen-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

32. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe VI suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

60. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

61. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

62. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

63. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 62., inclusive, with the same force and effect as if hereafter set forth at length.

64. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

65. In or about 1985, Jeffrey Edward Epstein sexually abused plaintiff when she was twenty-three-years-old.

66. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

67. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional

and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

68. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

69. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

70. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

71. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

72. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1 through 71., inclusive, with the same force and effect as if hereafter set forth at length.

73. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

74. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

75. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

76. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

77. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

78. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

79. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

80. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 79., inclusive, with the same force and effect as if hereafter set forth at length.

81. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

82. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

83. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

84. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

85. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

86. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS FOR A SEVENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

87. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 86., inclusive, with the same force and effect as if hereafter set forth at length.

88. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

89. In or about 2003, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe III when she was a minor child.

90. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

91. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

92. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

93. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

94. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

95. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN EIGHTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

96. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 95., inclusive, with the same force and effect as if hereafter set forth at length.

97. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

98. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

99. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

100. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

101. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

102. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

103. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A NINTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

104. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 103., inclusive, with the same force and effect as if hereafter set forth at length.

105. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

106. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

107. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

108. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights. entitling plaintiff to recover punitive damages in amounts to be proven at trial.

109. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

110. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

111. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 110., inclusive, with the same force and effect as if hereafter set forth at length.

112. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

113. In or about 2001, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe IV when she was a minor child.

114. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

115. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

116. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

117. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

118. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

119. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN ELEVENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

120. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 119., inclusive, with the same force and effect as if hereafter set forth at length.

121. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

122. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

123. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

124. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

125. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

126. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

127. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWELTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

128. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 127., inclusive, with the same force and effect as if hereafter set forth at length.

129. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

130. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

131. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

132. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

133. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

134. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A THIRTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

135. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 134., inclusive, with the same force and effect as if hereafter set forth at length.

136. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

137. In or about 2004, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe V when she was nineteen-years-old.

138. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

139. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

140. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

141. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

142. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

143. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTEENTH CAUSE OF ACTION FOR ASSAULT
OF JANE DOE V AS TO DEFENDANT JEFFREY EDWARD EPSTEIN**

144. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 143., inclusive, with the same force and effect as if hereafter set forth at length.

145. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

146. Epstein's predatory, sexual and unlawful acts against plaintiff, created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

147. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

148. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

149. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

150. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

151. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTEENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

152. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 151., inclusive, with the same force and effect as if hereafter set forth at length.

153. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

154. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

155. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

156. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

157. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

158. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

159. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 158., inclusive, with the same force and effect as if hereafter set forth at length.

160. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

161. In or about 2001 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VI when she was approximately nineteen-years-old.

162. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

163. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

164. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

165. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

166. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

167. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SEVENTEENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

168. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 167., inclusive, with the same force and effect as if hereafter set forth at length.

169. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

170. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

171. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

172. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

173. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

174. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

175. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN EIGHTEENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

176. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 175., inclusive, with the same force and effect as if hereafter set forth at length.

177. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,** act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

178. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

179. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

180. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

181. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

182. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FIFTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

231. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 230., inclusive, with the same force and effect as if hereafter set forth at length.

232. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

233. In or about 2002 and continuing thereafter, Jeffrey Edward Epstein sexually abused Plaintiff Jane Doe IX when she was approximately twenty-two-years-old.

234. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

235. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

236. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

237. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

238. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

239. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SIXTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

240. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 239., inclusive, with the same force and effect as if hereafter set forth at length.

241. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

242. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

243. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

244. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

245. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

246. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

247. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SEVENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

248. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 247., inclusive, with the same force and effect as if hereafter set forth at length.

249. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

250. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

251. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

252. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling Plaintiff to recover punitive damages in amounts to be proven at trial.

253. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

254. This action falls within the exceptions to Article 16 of the C.P.L.R.

WHEREFORE, plaintiffs demand judgement against defendants in such sum as a jury would find fair, adequate and just containing the following relief:

A. A declaratory judgement that the actions, conduct and practices of defendants complained of herein violated the laws of the State of New York;

B. An injunction and order permanently restraining defendants from engaging in such unlawful conduct;

C. An award of damages in an amount to be determined at trial, plus prejudgment interest, to compensate plaintiffs for all monetary and/or economic harm; harm to their personal and professional reputations and loss of career fulfillment; for all non-monetary and/or compensatory harm, including but not limited to, compensation for physical anguish and mental

anguish; all other monetary and/or non-monetary losses suffered by plaintiffs; and that by reason of the foregoing, plaintiffs sustained damages in a sum, pursuant to C.P.L.R. §3017, which exceeds the jurisdictional limits of all lower courts;

D. An award of punitive damages;

E. An award of costs that plaintiffs have incurred in this action, as well as plaintiffs' reasonable attorney's fees to the fullest extent permitted by law; and.

F. Such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: 

Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,

Index No.: _____/19

Plaintiffs,

-against-

**ATTORNEY
VERIFICATION**

**DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,**

Defendants.

-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of
New York State, and a member of the firm **MERSON LAW, PLLC**, attorneys for the
plaintiffs in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same
is true to his own knowledge, except as to the matters therein stated to be alleged upon
information and belief, and that as to those matters he believes it to be true;

That the sources of his information and knowledge are investigations and records in the
file; and,

That the reason this verification is made by affirmant and not by the plaintiffs is that the
plaintiff are not within the County where the attorney has his office.

Dated: New York, New York
December 3, 2019



JORDAN K. MERSON

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE
DOE IV, JANE DOE V, JANE DOE VI, JANE DOE
VII, JANE DOE VIII and JANE DOE IX

Plaintiffs,

Index No.: _____ 19

-against-

CLIENT
VERIFICATION

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the ESTATE OF
JEFFREY EDWARD EPSTEIN,

Defendants.

-----X
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

REDACTED . being duly sworn, deposes and says that:

I am a plaintiff in the within action; I have read the foregoing Complaint and
know the contents thereof; the same is true to my own knowledge, except as to the matters
therein state to be alleged on information and belief, and as to those matters I believe them
to be true.

Dated: New York, New York
December 2, 2019

REDACTED

REDACTED

Sworn to before me this
2nd day of December 2019


NOTARY PUBLIC

LEIDEN E APARICIO
Notary Public, State of New York
No. 01AP6371383
Qualified in Queens County
Commission Expires February 26, 2023

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV,
JANE DOE V, JANE DOE VI, JANE DOE VII, JANE DOE VIII
and JANE DOE IX,

Plaintiffs,

- against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

Defendants.

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC

Attorneys for Plaintiffs

Office and P.O Address, Telephone

150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

to All Parties

EXHIBIT

2

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X
JANE DOE I, *et al.*,

Plaintiffs.

- against -

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the ESTATE OF
JEFFREY EDWARD EPSTEIN,

Defendants.
----- X

:
:
: Index No. 950230/2019

:
: Hon. George J. Silver

:
: **STIPULATION AND**
: **[PROPOSED] ORDER**
: **ON PLAINTIFFS'**
: **ANONYMITY**

:
: (Motion Seq. 001)

IT IS HEREBY STIPULATED AND AGREED. by and between the undersigned attorneys, that any person subject to this Order, including the parties to this action and their respective counsel of record, shall adhere to the following terms:

1. Within three (3) days of entry of this Order, Counsel of Record for Plaintiffs shall disclose Plaintiffs' identities to Counsel of Record for Defendants, in writing.
2. Counsel of Record for Defendants may disclose Plaintiffs' identities only to Defendants and any attorneys, paralegals, and clerical or other assistants working with or for Defendants on matters related to this action; and the recipients of such information shall not disclose it to any other persons.
3. If Defendants wish to disclose Plaintiffs' identities to any person not otherwise permitted to receive such information under this Order, Defendants are limited to doing so in connection with defending this action, and must require such person to first execute a non-disclosure agreement, in a form agreed to by the parties, that prevents such person from disclosing Plaintiffs' identities to any other persons. Defendants must maintain a list of all such persons to whom Plaintiffs' identities are disclosed and copies of the executed non-disclosure agreements, all of which are subject to *in camera* inspection.
4. All portions of pleadings, motions or other papers filed with the Court that disclose Plaintiffs' identities shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. All parties shall use their best efforts to minimize such sealing. Any party filing a motion or any other papers with the Court under seal

shall also publicly file a redacted copy of the same, via NYSCEF, that redacts the Plaintiffs' identities and text that would reveal Plaintiffs' identities.

5. The parties may seek to modify or amend this Order at any time upon motion to the Court or by stipulation.
6. Motion Seq. 001 is resolved by entry of this Order; and the hearing on Motion Seq. 001 currently set for December 17, 2019 at 3:00 p.m. is canceled.

AND IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in counterparts; and facsimile signatures are deemed originals.

Dated: New York, New York
December 5, 2019

MERSON LAW, PLLC

TROUTMAN SANDERS LLP

By: Jordan Merson
Jordan K. Merson
150 East 58th Street, 34th Floor
New York, NY 10155
(212) 603-9100

Attorneys for Plaintiffs

By: Bennet J. Moskowitz / K.P.
Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
(212) 704-6000

*Attorneys for Defendants Darren K. Indyke and
Richard D. Kahn, Co-Executors of the Estate of Jeffrey
E. Epstein*

SO ORDERED.

Date: _____
New York, New York

HON. GEORGE J. SILVER, J.S.C.

EXHIBIT

3



STATE OF NEW YORK
UNIFIED COURT SYSTEM
111 CENTRE STREET
NEW YORK, N.Y. 10013
(646) 386-4200

LAWRENCE K. MARKS
Chief Administrative Judge

GEORGE J. SILVER
Deputy Chief Administrative Judge
New York City Courts

ADMINISTRATIVE ORDER #371
AMENDED

By the authority vested in me as Deputy Chief Administrative Judge of the courts within New York City, and as the coordinating judge of all cases filed under the Child Victims Act¹ (the "CVA") within that jurisdiction, I hereby order as follows:

1. This Order applies to all cases filed or hereafter filed in the Supreme Courts in and for the counties of Bronx, Kings, New York, Queens, and Richmond pursuant to the CVA, including any such matters filed before the one-year window commenced on August 14, 2019, and which were then stayed pending the opening of the window on August 14, 2019.
2. While a steering committee negotiates a Case Management Order to address the efficient prosecution and defense of cases filed under the CVA, all Preliminary Conferences currently scheduled or requested as of the effective date of this Order, and any requests for Preliminary Conferences made after the effective date of this Order are adjourned to a control date of January 31, 2020.²
3. The time to respond to any discovery demands served by the parties as of the effective date of this Order is adjourned without a date. No demands for discovery shall be served by any party until further Order of this Court.
4. Plaintiffs' time to respond to stipulations and orders that consent to or direct the production of identifying information, consisting of a plaintiff's name (including maiden name, if any), date of birth, social security number, parents and/or guardian's names, current address, and address at the time of the alleged abuse, for plaintiffs proceeding under pseudonyms is extended to December 20, 2019. Plaintiffs shall provide such identifying information to


¹ L. 2019 c.11.

² Parties may make an application to extend this, and other deadlines, as necessary.

defense counsel in a manner other than disclosure in a public filing on NYSCEF and as agreed to by the parties. Nothing in this Order prevents plaintiffs from voluntarily providing such identifying information at any time.

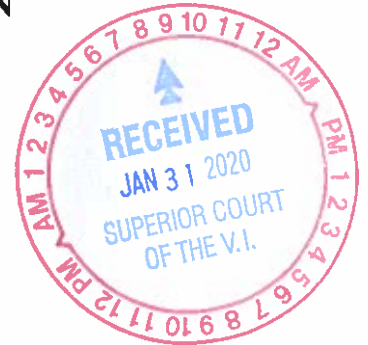
5. All papers in opposition to any Order to Show Cause or Notice of Motion, including motions to dismiss under CPLR §3211 or §3212, but excluding motions to proceed anonymously or by pseudonym, are adjourned until January 31, 2020. Should the motion(s) not be resolved and withdrawn by the parties as of that date, the Court will set any additional due dates as necessary. No motions, other than motions to proceed anonymously or by pseudonym, shall be filed prior to January 31, 2020 without permission of the Court. As such, no motions to dismiss under CPLR §3211 or §3212 shall be filed prior to January 31, 2020.
6. The time to answer, move against, or otherwise respond to any complaint that has been served as of the effective date of this Order is extended until further Order of the Court. This Order supersedes any due dates for answers or motions previously stipulated to by the parties and/or ordered by this Court.
7. The time to answer, move against, or otherwise respond to any complaint that is served after the effective date of this Order, but prior to January 31, 2020, shall be extended until a date stipulated to by the parties or as directed by further Order of the Court.
8. Notwithstanding any stipulation or Court Order to the contrary, no motion to sever shall be filed prior to January 31, 2020. Consistent with the CPLR, motions to sever may be filed after January 31, 2020.
9. Counsel shall make a good faith effort to resolve any motions to dismiss or motions to sever prior to filing such motions.

Dated: December 11, 2019



Hon. George J. Silver
Deputy Chief Administrative Judge
New York City Courts

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



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

Case No. ST-19-PB-80

Claim for Unliquidated and Unsecured Damages

COME NOW, Claimant Jane Doe III (“Claimant”), through her attorney Melody D. Westfall, Esq. of Westfall Law, PLLC, 5032 Anchor Way, Suite 8, Christiansted, St. Croix 00820, and hereby present and file this claim for unliquidated and unsecured damages from the estate in the above-referenced matter, and state as follows:

1. Prior to being arrested and brought into custody on July 6, 2019 by federal authorities in New York, the decedent, Jeffrey E. Epstein (the “Decedent”), was the subject of multiple on-going investigations into his criminal conduct including, but not limited to, his sex trafficking and sexual abuse of dozens of women, some of whom were underage. Claimant is one of those victims.

2. On information and belief, after his arrest, the decedent conspired with multiple individuals, including his attorneys and the two men named as the co-executors of his estate, to fraudulently convey and prevent the distribution of his assets to his numerous victims, including Claimant, in the event that they sought damages through civil recourse.

3. The deceased was able to do this by executing a Last Will and Testament on August 8, 2019, which included a newly formed pour-over trust known as The 1953 Trust (the “Trust”), just two days before his death by suicide on August 10, 2019. There is no doubt that these documents were set-up to defraud his creditors, including Ms. Claimant. A true and correct copy

of the decedent's Last Will and Testament is annexed hereto as Exhibit "1" and a true and correct copy of decedent's death certificate is attached hereto as Exhibit "2".

4. In decedent's petition for probate and letters testamentary, the value of personal property and total estate property is listed at \$577,672,654.00. See Exhibit 1.

5. On December 3, 2019, Claimant and eight of her fellow survivors filed a civil action in the Supreme Court of the State of New York, County of New York (New York County Index No.: 950230/2019) seeking damages against the decedent's estate. A true and correct copy of the Summons and Verified Complaint is annexed hereto as Exhibit "3".

6. Because Claimant was a minor when she was abused by the deceased, her claim was brought timely pursuant to New York's recently enacted Child Victims Act and NY CPLR § 214-g.

7. Furthermore, Claimant's claim is also timely pursuant to NY CPLR § 215(8)(a) which provides that a claimant shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against the deceased with respect to the same sex trafficking enterprise and sexual conduct from which Claimant's claim arises, was terminated less than a year ago on August 29, 2019.

8. Specifically, starting in or about 2003 and continuing for a period of time thereafter, when Claimant was approximately thirteen years old, Epstein and his associates repeatedly sexually assaulted, abused, battered and raped her, which caused severe and serious injuries.

9. As such, Claimant, by and through the above-referenced claim, has a right to money damages, whether it is in the form of a judgment or liquidated, fixed or matured damages, and therefore, has an equitable lien on all unencumbered assets and property of the decedent's estate.

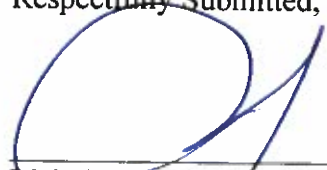
10. Accordingly, Claimant's claim requires that this Court not only secure sufficient assets from the estate to pay her for whatever damages and losses she may be deemed entitled to for which further information can be provided upon request, but also prevent the sale, transfer or waste of any assets or property that are part of the decedent's estate.

WHEREFORE, Claimant prays that the Court (a) enter judgment against decedent's estate in an amount sufficient to satisfy her Final Judgment in all pending matters, along with interest, attorneys' fees and punitive damages related to the decedent's fraudulent scheme and activities; (b) or in the alternative, stay all further proceedings in this matter pending the disposition of Claimant's New York lawsuit against the Estate; and, (c) all other further relief as this Court may deem just and proper.

This Claim is verified by counsel, pursuant to 15 V.I.C. § 393 and 5 V.I.C. § 699, as it is sworn under penalties of perjury that the contents hereof are true and correct to the best of the undersigned counsel's knowledge, information and belief.

Dated: Christiansted, St. Croix
January 31, 2020

Respectfully Submitted,



Melody D. Westfall, Esq.
V.I. Bar Number 12052
WESTFALL LAW PLLC
5032 Anchor Way, Suite 8
Christiansted, St. Croix 00820
mwestfall@westfalllaw.com
(340) 227-0017
Attorneys for Claimant Jane Doe III

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2020, I caused a true and correct copy of the foregoing

Claim for Unliquidated and Unsecured Damages to be served on the following:

William Blum, Esq.
KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Darren K. Indyke, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Richard Kahn, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
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9800 Buccaneer Mall Building 2, Suite 9
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St. Thomas, USVI 00801

EXHIBIT

1

10 AUG 15 PM 16:10

**LAST WILL AND TESTAMENT
OF
JEFFREY E. EPSTEIN**

I, JEFFREY E. EPSTEIN, a resident and domiciliary of St. Thomas, United States Virgin Islands, do make, publish and declare this to be my Will hereby revoking all prior Wills and Codicils made by me

1: I direct my Executor to pay from my estate all expenses of my last illness, my funeral and burial expenses, the administration expenses of my estate and all of my debts duly proven and allowed against my estate.

A. I direct my Executor to pay from my estate, as compensation to each Executor for serving as Executor hereunder, the sum of Two Hundred Fifty Thousand Dollars (\$250,000) to each Executor upon the completion of probate of my estate. No Executor shall receive any other compensation for serving as Executor hereunder; provided, however, that my Executor shall be reimbursed from my estate for all reasonable costs, expenses, charges, and liabilities incurred or paid in respect thereto, including fees and expenses of counsel or any other agents hired by my Executor, and my Executor shall not be liable therefor individually.

B. I direct my Executor to pay from my estate the federal and state transfer taxes described in Paragraph E(1) of Article SEVENTH.

C. I direct my Executor to pay from my estate all expenses of storing, insuring, packing, shipping and delivering my tangible personal property in accordance with the provisions of Article SECOND.

2: I give all of my property, real and personal, wherever situated, after the payments and distributions provided in Article FIRST, to the then acting Trustees of The 1953 Trust ("Trust") created under that certain Trust Agreement of The 1953 Trust (the "Trust Agreement") dated August 8, 2019, as the same may be amended from time to time, to be held in accordance with the provisions comprising the Trust Agreement at the time of my death.

3: I appoint DARREN K. INDYKE and RICHARD D. KAHN to serve as the Executors of this Will. If any one or more of my Executors fails to qualify, is unable or unwilling to serve or ceases to act, I appoint BORIS NIKOLIC, as successor Executor. If any successor Executor fails to qualify, is unable or unwilling to serve or ceases to act, I authorize the last acting Executor to designate his or her successor. Such designation shall be made by written instrument delivered to such designated successor Executor.

A. If my estate must be administered in whole or in part in any jurisdiction other than the state or territory of my domicile at the date of my death, and if my Executor is unable or unwilling to serve in such jurisdiction, then I appoint the successor Executor of my estate designated in Paragraph A of Article THIRD as successor Executor in such

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jurisdiction only, provided that he or she is able and willing to serve in such jurisdiction. If no Executor or successor Executor is able and willing to serve in such jurisdiction, my Executor shall designate a successor Executor to serve in such jurisdiction. Such designation shall be made by written instrument delivered to such successor Executor.

B. No bond or other security shall be required of any Executor in any jurisdiction.

C. Any Executor may resign in the manner provided for by the governing statutes of the state or territory having jurisdiction of the administration of my estate or in the absence of such statutory guidance, by filing a written notice of resignation with the Court having jurisdiction of the administration of my estate. Any Executor who resigns shall not be entitled to any compensation hereunder for any services rendered as Executor prior to his or her resignation.

D. My Executor shall not be accountable or responsible to any person interested in my estate for the manner in which my Executor in good faith exercises or declines to exercise any discretionary authority or power of my Executor. My Executor shall not be liable for any loss or depreciation in value occasioned by reason of any negligence, error or mistake of judgment in entering into any transaction, in making any sale or investment, in continuing to hold any property or by reason of any action or omission, whether by my Executor or any other fiduciary, unless my Executor has acted in bad faith. In the absence of proof by affirmative evidence to the contrary, each Executor shall be deemed to have acted within the scope of my Executor's authority, to have exercised reasonable care, diligence and prudence and to have acted impartially as to all interested persons. An Executor shall not be liable for the acts or defaults of another Executor.

4. The following provisions shall apply to my estate and to my Executor, except as is otherwise specifically provided in this Will:

A. My Executor has the entire care and custody of all assets of my estate. My Executor has the power to do everything my Executor in good faith deems advisable without necessity of any judicial authorization or approval, even though but for this power it would not be authorized or appropriate for fiduciaries under any statutory or other rule of law. My Executor shall exercise my Executor's best judgment and discretion for what my Executor believes to be in the best interests of the beneficiaries hereunder. Except as otherwise specifically provided in this Will, if two Executors are empowered to participate in the decision to exercise or not to exercise any fiduciary power granted by this Will or by law, such decision shall be made by such Executors acting unanimously. If more than two Executors are empowered to participate in the decision to exercise or not exercise any fiduciary power granted by this Will or by law, a majority of such Executors shall be empowered to make such decision.

B. Except as otherwise provided herein, my Executor shall have the power:

(1) to enter upon and take possession of the assets of my estate and collect the income and profits from such assets, and to invest and reinvest such assets in real, personal or mixed assets (including the common trust funds of a corporate

fiduciary) or in undivided interests therein without being limited by any present or future investment laws:

(2) to retain all or any part of the assets of my estate (without regard to the proportion that any one asset or class of assets may bear to the whole) in the form in which such assets were received or acquired by my Executor;

(3) to sell or dispose of, exchange, transfer, invest or loan all or any part of the assets of my estate which may, at any time, be held by my Executor for such sums or upon such terms as to payment, security or otherwise as my Executor determines, either by public or private transactions;

(4) to buy and sell options, warrants, puts, calls or other rights to purchase or sell (collectively "options") relating to any security or securities, regardless of whether such security or securities are then held by my Executor, and whether such options are purchased or sold on a national securities exchange, and to exercise with respect to such options all powers which an individual owner thereof could exercise, including, without limitation, the right to allow the same to expire;

(5) with respect to oil, natural gas, minerals, and all other natural resources and rights to and interests therein (together with all equipment pertaining thereto), including, without limiting the generality of the foregoing, oil and gas royalties, leases, or other oil and gas interests of any character, whether owned in fee, as lessee, lessor, licensee, concessionaire or otherwise, or alone or jointly with others as partner, joint tenant, or joint venture in any other noncorporate manner, (a) to make oil, gas and mineral leases or subleases; (b) to pay delay rentals, lease bonuses, royalties, overriding royalties, taxes, assessments, and all other charges; (c) to sell, lease, exchange, mortgage, pledge or otherwise hypothecate any or all of such rights and interests; (d) to surrender or abandon, with or without consideration, any or all of such rights and interests; (e) to make farm-out, pooling, and unitization agreements; (f) to make reservations or impose conditions on the transfer of any such rights or interests; (g) to employ the most advantageous business form in which properly to exploit such rights and interests, whether as corporations, partnerships, limited partnerships, mining partnerships, limited liability companies, joint ventures, co-tenancies, or otherwise exploit any and all such rights and interests; (h) to produce, process, sell or exchange all products recovered through the exploitation of such rights and interests, and to enter into contracts and agreements for or in respect of the installation or operation of absorption, reprocessing or other processing plants; (i) to carry any or all such interests in the name or names of a nominee or nominees; (j) to delegate, to the extent permitted by law, any or all of the powers set forth herein to the operator of such property; and (k) to employ personnel, rent office space, buy or lease office equipment, contract and pay for geological surveys and studies, procure appraisals, and generally to conduct and engage in any and all activities incident to the foregoing powers, with full power to borrow and pledge in order to finance such activities; together with the power to allocate between principal and income any net proceeds received as consideration, whether as royalties or otherwise, for the permanent severance from lands of oil, natural gas, minerals, and all other natural resources;

(6) to hold all or any part of the assets of my estate in cash or in bank accounts without the necessity of investing the same;

- (7) to improve, repair, partition, plat or subdivide all or any part of the assets of my estate;
- (8) to litigate, defend, compromise, settle, abandon or submit to arbitration on such terms and conditions as my Executor determines any claims in favor of or against my estate or the assets of my estate;
- (9) to loan or borrow money in such amounts and upon such terms and conditions as my Executor determines, assume such obligations or give such guarantees as my Executor determines, for the purpose of the acquisition, improvement, protection, retention or preservation of the assets of my estate, or for the welfare of the beneficiaries of my estate;
- (10) to carry on for as long and in such manner as my Executor determines any business enterprise in which I owned any interest at my death, either individually, or as a partner, member, joint venture, stockholder or trust beneficiary; to sell such business enterprise as an ongoing business; to consolidate, merge, encumber, dissolve, liquidate or undertake any other extraordinary corporate transaction relating to such business enterprise;
- (11) to vote in person or by proxy any and all stock or securities and to become a party to any voting trusts, reorganization, consolidation or other capital or debt readjustment of any corporation, association, partnership, limited liability partnership, limited liability company or individual with respect to stocks, securities or debts held by my estate;
- (12) except as provided for in Sections (20) and (21) of this Article Fourth, to enter into any good faith transactions with any Executor individually or with any corporation, partnership or other entity in which any Executor has an ownership interest;
- (13) To purchase from my estate any stocks, bonds, securities, real or personal property, or other assets, or make loans to my estate even though the same person or persons occupy the office of my Trustee and the office of the Executor of my estate;
- (14) to lease, mortgage, pledge, grant a security interest in or otherwise encumber all or any part of the assets of my estate for any term of years whether or not beyond the duration of my estate (including, without limitation, any such action for the benefit of any of the beneficiaries of my estate);
- (15) to abandon any property of my estate, real or personal, which my Executor may deem worthless or not of sufficient value to warrant keeping or protecting; to abstain from the payment of taxes, water rents or assessments and to forego making repairs, maintaining or keeping up any such property; and to permit such property to be lost by tax sale or other proceedings or to convey any such property for a nominal consideration or without consideration so as to prevent the imposition of any liability by reason of the continued ownership thereof;

(16) to elect the mode of distribution of the proceeds payable to my estate from any profit-sharing plan, pension plan, employee benefit plan, individual retirement plan, insurance contract or annuity contract pursuant to the terms of such plan;

(17) to allocate, in my Executors discretion, any adjustment to basis provided to my estate under the provisions of Federal and State law with respect to property comprising my estate, without any obligation to make a compensatory adjustment among the beneficiaries hereunder on account of such allocation;

(18) to conduct any audit, assessment or investigation with respect to any asset of my estate regarding compliance with any law or regulation having as its object protection of public health, natural resources or the environment ("Environmental Laws"); to pay from the assets of my estate to remedy any failure to comply with any Environmental Law (even to the exhaustion of all of the assets of my estate); and, as may be required in my Executor's judgment by any Environmental Law, to notify any governmental authority of any past, present or future non-compliance with any Environmental Law; and

(19) to sell to the Trustee under the Trust Agreement any stocks, bonds, securities, real or personal property or other assets or borrow from the Trustee under the Trust Agreement even though the same person or persons occupy the office of the Executor of my estate and the Trustee under the Trust Agreement.

(20) No executor shall directly or indirectly buy or sell any property for the estate from or to himself, or from or to his relative, employer, employee, partner, or other business associate.

(21) No executor shall lend estate funds to himself, or to his relative, employer, employee, partner, or other business associate.

C. Except as otherwise provided herein, my Executor shall have the power:

(1) to employ agents, attorneys-at-law, consultants, investment advisers (to whom my Executor has discretion to delegate my Executor's investment authority and responsibility), other executors and other fiduciaries in the administration of my Executor's duties; to delegate to such persons, or to one or more of my Executors, the custody, control or management of any part of my estate as my Executor determines and to pay for such services from the assets of my estate, without obtaining judicial authorization or approval;

(2) to delegate, in whole or in part, to any person or persons the authority and power to (a) sign checks, drafts or orders for the payment or withdrawal of funds, securities and other assets from any bank, brokerage, custody or other account in which funds, securities or other assets of my estate shall be deposited. (b) endorse for sale, transfer or delivery, or sell, transfer or deliver, or purchase or otherwise acquire, any and all property, stocks, stock warrants, stock rights, options, bonds or other securities whatsoever, (c) gain access to any safe deposit box or boxes in which my assets or assets of my estate may be located or which may be in the name of my Executor and remove part or all of the contents of any such safe

deposit box or boxes and release and surrender the same, and (d) take any other action that my Executor may have the power to take with respect to my estate and the property thereof; no person or corporation acting in reliance on any such delegation shall be charged with notice of any revocation or change of such delegation unless such person or corporation receives actual notice thereof;

(3) to pay any property distributable to a beneficiary under a legal disability or who has not attained the age of 21, without liability to my Executor, by paying such property (a) to such beneficiary, (b) for the use of such beneficiary, (c) to a legal representative of such beneficiary appointed by a court or if none, to a relative for the use of such beneficiary, or (d) to a custodian for such beneficiary designated by my Executor, to hold until age 21 or such earlier age as shall be the maximum permitted under applicable law;

(4) to distribute to any of the beneficiaries of my estate in kind or in cash, or partly in kind and partly in cash, and to allocate different kinds or disproportionate shares of assets or undivided interests in assets among all of such beneficiaries;

(5) to have evidence of ownership of any security maintained in the records of a Federal Reserve Bank under the Federal Reserve Book Entry System; to deposit funds in any bank or trust company; to carry in the name of my Executor or the nominee or nominees of my Executor and with or without designation of fiduciary capacity, or to hold in bearer form, securities or other property requiring or permitting of registration; and to cause any securities to be held by a depository corporation of which an Executor is a member or by an agent under a safekeeping contract; provided, however, that the books and records of my Executor shall at all times show that such investments are part of my estate;

(6) to renounce and disclaim, in whole or in part, and in accordance with applicable law, any assets, interests, rights or powers (including any power of appointment) which are payable to (or exercisable by) me or my estate, which are includible in my estate or Gross Estate or over which I have any right, title, interest or power; and

(7) to make, execute and deliver any and all such instruments in writing as shall be necessary or proper to carry out any power, right, duty or obligation of my Executor or any disposition whatsoever of my estate or any asset of my estate and to exercise any and all other powers incidental or necessary to carry out or to fulfill the terms, provisions and purposes of my estate.

D. In connection with any insurance policy or annuity on the life of an Executor which is included in my estate, such Executor shall not participate in the decision to exercise or not exercise any fiduciary power in connection with any incidents of ownership for such policy or annuity, including, without limitation, any decision to continue, assign, terminate or convert such policy or annuity or to name the beneficiary of such policy or annuity.

E. An Executor hereunder may by a written notice delivered to the other Executor decline to participate in the decision to exercise or not exercise any fiduciary power granted by this Will or by law.

F. If an Executor is not empowered (because of a conflict of

interest, declination to act or otherwise) to participate in the decision to exercise or not exercise any fiduciary power granted by this Will or by law, then the remaining Executor shall be empowered to make such decision. If no Executor is empowered to participate in such decision, then the successor Executor of my estate designated in Paragraph A of Article THIRD and able and willing to act shall be empowered to make such decision. If no Executor or successor Executor is empowered to participate in such decision, my Executor may designate a successor Executor to serve as Executor of my estate who shall be empowered to make such decision but shall have no other power or authority of my Executor. Such designation shall be by written notice delivered to such successor Executor.

G. Except as otherwise specifically provided in this Paragraph G(1) of this Article, and except as provided in Paragraph G(2) of this Article, my Executor shall allocate receipts and disbursements in accordance with sound trust accounting principles and shall have discretion to allocate receipts and disbursements when the treatment is uncertain under applicable laws or generally accepted accounting principles in the judgment of my Executor.

(1) Except as otherwise specifically provided in this Will, my Executor shall not treat any part of the principal amount of the proceeds of sale of any asset of my estate as income distributable to or for the benefit of any beneficiary entitled to distributions of income; provided, however, that my Executor shall treat a portion of any proceeds of sale of any financial instrument originally issued or acquired at a discount equal to the amount which (a) has previously been characterized as ordinary income for income tax purposes or (b) will be characterized as ordinary income for income tax purposes in the year of such sale, as income for trust accounting purposes.

5: Where a party to any proceeding with respect to my estate has the same interest as a person under a disability, it shall not be necessary to serve legal process on the person under a disability.

6: If any beneficiary under the Trust shall in any way directly or indirectly (a) contest or object to the probate of my Will or to the validity of any disposition or provision of my Will or of the Trust or (b) institute or prosecute, or be in any way directly or indirectly instrumental in the institution or prosecution of, any action, proceeding, contest, objection or claim for the purpose of setting aside or invalidating my Will or the Trust or any disposition therein or provision thereof, then I direct that (a) any and all provisions in the Trust for such beneficiary and his issue in any degree shall be null and void and (b) my estate, whether passing under my Will or the Trust or pursuant to the laws of intestacy, shall be disposed of as if such beneficiary and his issue in any degree had all failed to survive me.

7: A. As used herein:

(1) The term "Executor" of a person's estate means all persons or entities who occupy the office of executor, administrator, personal representative, or ancillary administrator while such persons or entities occupy such office, whether one or more persons or entities occupy such office at the same time or times, and includes any



successor or successors to that office. The term "Trustee" means all persons or entities who occupy the office of Trustee under the Trust Agreement while such persons or entities occupy such office, whether one or more persons or entities occupy the office of Trustee at the same time or times, and includes any successor Trustee or Trustees. A reference to a person's estate or probate estate means that person's estate which is subject to probate administration. A reference to a person's Will means such person's Last Will and Testament and any Codicil or Codicils thereto.

(2) The term "IRC section" means a section of the Internal Revenue Code of 1986, as amended, or the corresponding provision of any successor Internal Revenue law, as in effect as of the date of my death.

(3) A reference to any tax also includes any interest or penalties thereon. A reference to a person's "Gross Estate" means such person's gross estate as finally determined for purposes of computing such person's federal estate tax.

(4) Whenever the singular number is used, the same shall include the plural, and the masculine gender shall include the feminine and neuter genders.

B. The federal and state transfer taxes which my Executor shall be obligated to pay pursuant to Paragraph B of Article FIRST shall consist of all federal and state estate, inheritance, succession, and similar taxes (including any federal or state generation-skipping transfer tax) imposed upon my probate estate or by reason of my death in respect to all assets which pass under this Will or the Trust Agreement. Subject to Paragraph B(2) of this Article, all federal estate taxes with respect to assets not passing under this Will or the Trust Agreement (such assets are referred to as the "Apportionment Assets") and any applicable state estate taxes with respect to the Apportionment Assets shall be apportioned among all persons interested in the Apportionment Assets. My Executor shall make reasonable efforts to collect all federal estate taxes and state estate, inheritance, succession and similar taxes allocable to the Apportionment Assets from the recipients of the Apportionment Assets. Without changing the apportionment of taxes in this Paragraph B(1), my Executor has discretion, but is not required, to pay all or part of such taxes allocable to the Apportionment Assets. To the extent my Executor pays such taxes allocable to the Apportionment Assets, my Executor shall seek reimbursement for such taxes from the recipients of the Apportionment Assets. My Executor shall not be personally liable for any of such taxes if my Executor is unable, with reasonable efforts, to collect payment (or reimbursement) from any recipient of any Apportionment Assets for any or all of such taxes allocable to such assets.

(1) My Executor has discretion to direct the Trustee of the Trust Agreement to pay all or any portion of the taxes which my Executor is directed or obligated to pay pursuant to Paragraph B of Article FIRST and this Paragraph B pursuant to a written direction delivered to the Trustee under the Trust Agreement. Any taxes which my Executor directs the Trustee under the Trust Agreement to pay shall be allocated and paid from the trusts under the Trust Agreement as provided under the Trust Agreement.

C. Except as otherwise specifically provided in this Will, a bequest or devise to an individual who does not survive me shall lapse notwithstanding any law to the contrary.

D. To the extent that the distribution to the Trustee under the Trust Agreement pursuant to Article SECOND shall not be effective, I give all the rest of my property, real and personal, wherever situated, after the payments and distributions provided in Article FIRST, to the person or persons named as Trustee or Trustees under the Trust Agreement, be to held in trust under this Will in accordance with the provisions comprising the Trust Agreement at the time of my death, which provisions are incorporated in this Will by reference.

IN WITNESS WHEREOF, I have duly executed this Will this 8th day of August, 2019.



JEFFREY E. EPSTEIN

The foregoing instrument, consisting of eleven (11) pages, was signed in our presence by Jeffrey E. Epstein and was declared by him to be his last Will. We, at the request of and in the presence of Jeffrey E. Epstein and in the presence of each other, have subscribed our names below as witnesses. We declare that we are of sound mind and of the proper age to witness a will, that to the best of our knowledge the testator is of the age of majority, or is otherwise legally competent to make a will, and appears of sound mind and under no undue influence or constraint. Under penalty of perjury, we declare these statements are true and correct on this 8th day of August, 2019 at New York, New York.

Mariela residing at [REDACTED]

Mariela A. Colón Miró

Gulnora Tali residing at [REDACTED]

GULNORA TALI

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

13 MAR 15 PM 6:10

IN THE MATTER OF THE ESTATE OF)
JEFFREY E. EPSTEIN) PROBABE NO. ST-19-PB-____
Deceased.) ACTION FOR TESTATE
ADMINISTRATION

OATH OF WILLINGNESS TO SERVE AS EXECUTOR AND
APPOINTMENT OF LOCAL COUNSEL

I, Darren K. Indyke, hereby declare, certify, verify, and state under penalty of perjury under the laws of the United States Virgin Islands that:

1. I am an adult of sound mind, have never been convicted of any felony or of a misdemeanor involving moral turpitude, and I am not a judicial officer.
2. I am a resident of Florida.
3. The Last Will and Testament of Jeffrey E. Epstein nominates and appoints me as an Executor of the Estate of Jeffrey E. Epstein, deceased.
4. I am willing to act as Executor of the above-captioned Estate according to the law and to the best of my ability and I will faithfully discharge the duties and obligations of Executor.
5. I will render a true accounting of all monies and property coming into my possession for which I am responsible.
6. I am willing to act as Executor of the above-captioned Estate and request that the Court act upon and grant all the prayers of the Petition for Probate.
7. I am a non-resident of the Virgin Islands, and thus, I appoint the law office of KELLERHALS FERGUSON KROBLIN PLLC, located in the Virgin Islands, specifically at Royal Palms Professional Building, 9053 Estate Thomas, Suite 101, St. Thomas, VI 00802, as my attorney upon whom service of all papers may be made.

Darren K. Indyke

SUBSCRIBED AND SWORN to before

me this ____ day of _____, 2019.

NOTARY



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

19 AUG 15 PM 12:16

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

PROBATE NO. ST-19-PB-____
ACTION FOR TESTATE
ADMINISTRATION

OATH OF WILLINGNESS TO SERVE AS EXECUTOR AND
APPOINTMENT OF LOCAL COUNSEL

I, Richard D. Kahn, hereby declare, certify, verify, and state under penalty of perjury under the laws of the United States Virgin Islands that:

1. I am an adult of sound mind, have never been convicted of any felony or of a misdemeanor involving moral turpitude, and I am not a judicial officer.
2. I am a resident of New York, New York.
3. The Last Will and Testament of Jeffrey E. Epstein nominates and appoints me as an Executor of the Estate of Jeffrey E. Epstein, deceased.
4. I am willing to act as Executor of the above-captioned Estate according to the law and to the best of my ability and I will faithfully discharge the duties and obligations of Executor.
5. I will render a true accounting of all monies and property coming into my possession for which I am responsible.
6. I am willing to act as Executor of the above-captioned Estate and request that the Court act upon and grant all the prayers of the Petition for Probate.
7. I am a non-resident of the Virgin Islands, and thus, I appoint the law office of KELLERHALS FERGUSON KROBLIN PLLC, located in the Virgin Islands, specifically at Royal Palms Professional Building, 9053 Estate Thomas, Suite 101, St. Thomas, VI 00802, as my attorney upon whom service of all papers may be made.

Richard D. Kahn

Richard D. Kahn

SUBSCRIBED AND SWORN to before

me this 15th day of August, 2019.

Marianne Barnett
NOTARY

MARIANNE BARNETT
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01BA6276845
Qualified in Suffolk County
Term expires February 25, 2021

<u>PERSONAL PROPERTY²</u>	<u>VALUE</u>
Cash	\$ 56,547,773.00
Fixed Income Investments	\$ 14,304,679.00
Equities	\$ 112,679,138.00
Aviation Assets, Automobiles and Boats	\$ 18,551,700.00
Fine Arts, Antiques, Collectibles, Valuables & Other Personal Property	TBD subject to appraisal/valuation
Hedge Funds & Private Equity Investments	\$ 194,986,301.00
10,000 shares of Maple, Inc., a U.S. Virgin Islands corporation which holds title to 9 East 71 st Street New York, NY 10021	\$ 55,931,000.00
10,000 shares of Cypress, Inc., a U.S. Virgin Islands Corporation, which holds title to 49 Zorro Ranch Road Stanley, New Mexico 87056	\$ 17,246,208.00
10,000 shares of Laurel, Inc., a U.S. Virgin Islands Corporation, which holds title to 558 El Brillo Way Palm Beach, Florida 33480	\$ 12,380,209.00
999 shares of SCI IEP, a French Company which holds title to units 47 with mezzanine, 48 and 81 on the 2nd floor, units 63 and 74 on the 5 th floor and units 5 and 22 (cellars) in the basement 22 Avenue Foch Paris, France 75116	\$ 8,672,823.00
10,000 shares of Poplar, Inc., a U.S. Virgin Islands Corporation, which holds title to Great St. James Island No. 6A Red Hook Quarter St. Thomas, Virgin Islands	\$ 22,498,600.00
10,000 shares of Nautilus, Inc., a U.S. Virgin Islands Corporation, which holds title to Little St. James Island No. 6B Red Hook Quarter Parcels A, B & C St. Thomas, Virgin Islands	\$ 63,874,223.00
TOTAL PERSONAL PROPERTY:	\$ 577,672,654.00
TOTAL ESTATE PROPERTY:	\$ 577,672,654.00

² Values are subject to appraisal and/or update to their date of death valuation, which will be confirmed in verified inventory to be filed with the Court.

- 6) Petitioners are investigating potential debts and claims of the Estate and at this time they are unknown.
- 7) That the names and addresses, insofar as known to Petitioners, of the heirs and next of kin of the deceased, who would be entitled to share the estate if he had left no will; the relation of each such person to him; the proportion due each such person, and whether each of them is an adult or an infant are as follows:

<u>NAMES</u>	<u>RELATIONSHIP</u>	<u>CAPACITY</u>	<u>SHARE</u>
Mark Epstein	Brother	Adult	100%


- 8) That Petitioners Darren K. Indyke and Richard D. Kahn be appointed Executors. They are adults of sound mind, are not convicted of any crime involving moral turpitude, and are not judicial officers of this Honorable Court.
- 9) Although Petitioners are not residents of the Virgin Islands, they are qualified to serve as Executors pursuant to 15 V.I.C. § 235(c) because they otherwise qualify under 15 V.I.C. § 235(a) and they have appointed the law firm of Kellerhals Ferguson Kroblin PLLC, which has offices on St. Thomas, Virgin Islands, to accept service of all papers for purposes of the probate of Decedent's estate.
- 10) The Decedent's Last Will and Testament provides that "No bond or other security shall be required of any Executor in any jurisdiction." See original Last Will and Testament attached hereto at Article THIRD, subsection B on page 2. Accordingly, Petitioners pray that the bond be waived pursuant to V.I. R. Prob. 3.

WHEREFORE, Petitioners pray:

- A. That the Estate of Jeffrey E. Epstein be entered into Probate;
- B. That a citation be issued to any heir or next of kin who has not signed a Waiver;
- C. That this Honorable Court order the issuance of a notice to creditors and claims procedure order in substantial form of that which will be separately proposed to the court forthwith;
- D. That the Last Will and Testament of Jeffrey E. Epstein, attached hereto, be admitted to Probate;
- E. That Darren K. Indyke and Richard D. Kahn be appointed Executors and Letters Testamentary be issued to them;
- F. That the bond be waived; and
- G. That the Petition be granted.

Respectfully,


DATED: August 15, 2019


WILLIAM BLUM, ESQ., Of Counsel
V.I. Bar No. 136
KELLERHALS FERGUSON KROBLIN PLLC
Royal Palms Professional Building
9053 Estate Thomas, Suite 101
St. Thomas, V.I. 00802-3602
Telephone: (340) 779-2564
Facsimile: (888) 316-9269
Email: wblum@solblum.com

VERIFICATION OF PETITION

I, Darren K. Indyke, Executor of the Last Will and Testament of Jeffrey E. Epstein, hereby verify I have read and do hereby certify that the statements contained in the Petition for Probate and for Letters Testamentary are accurate in so far as my knowledge and insofar as my own records show.

DATED: August 5, 2019


Darren K. Indyke

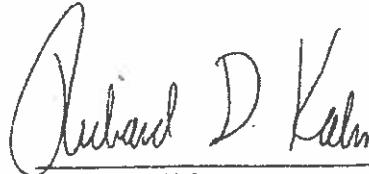
SUBSCRIBED AND SWORN to before me
this 15 day of August, 2019.



VERIFICATION OF PETITION

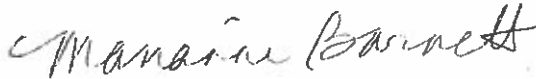
I, Richard D. Kahn, Executor of the Last Will and Testament of Jeffrey E. Epstein, hereby verify I have read and do hereby certify that the statements contained in the Petition for Probate and for Letters Testamentary are accurate in so far as my knowledge and insofar as my own records show.

DATED: August 15th, 2019



Richard D. Kahn

SUBSCRIBED AND SWORN to before me
this 15th day of August, 2019.



MARIANNE BARNETT
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01BA6276845
Qualified in Suffolk County
Term expires February 25, 2021

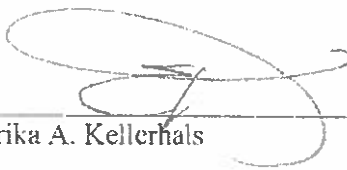
IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

19 APR 15 17:10

IN THE MATTER OF THE ESTATE OF)
JEFFREY E. EPSTEIN)
Deceased.)
_____)
PROBATE NO. ST-19-PB-_____
ACTION FOR TESTATE
ADMINISTRATION

AFFIDAVIT

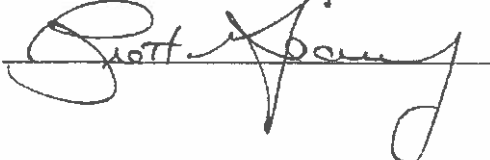
I, Erika A. Kellerhals, hereby depose or otherwise state that I do not know of any will or codicil of Jeffrey E. Epstein, deceased, other than the instrument in writing dated August 8, 2019; that I received the Last Will and Testament of Jeffrey E. Epstein from Jeffrey E. Epstein, and the said Jeffrey E. Epstein died on or about August 10, 2019.



Erika A. Kellerhals

SUBSCRIBED AND SWORN to before me

This 15th day of August, 2019.



Brett A. Geary
Notary Public: NP-144-15
Commission Expires: December 24, 2019
St. Thomas / St. John, USVI

THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK - DEPARTMENT OF HEALTH AND MENTAL HYGIENE
 AUG-11-2019 07:36 PM **CERTIFICATE OF DEATH** Certificate No. 156-19-032838

SUPERIOR COURT
 OF THE CITY OF NEW YORK
 19 AUG 15 PM 11:10

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD EPSTEIN**
 (First, Middle, Last)

Place of Death Manhattan	2a. New York City Manhattan	3a. Type of Place <input type="checkbox"/> Hospital Inpatient <input checked="" type="checkbox"/> Emergency Dept./Outpatient <input type="checkbox"/> Dead on Arrival	4. <input type="checkbox"/> Nursing Home/Long Term Care Facility <input type="checkbox"/> Hospice Facility <input type="checkbox"/> Decedent's Residence <input type="checkbox"/> Other Specify _____	2d. Any Hospice care in last 30 days <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown	2e. Name of hospital or other facility (if not facility, street address) New York-Presbyterian-Lower Manhattan Hospital	
Date and Time of Death or Found Dead	3b. (Month) August	(Day) 10	(Year-yyyy) 2019	3c. Time 7:36	4. Sex <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM Male	5. OCME Case No. M19019432
6. CAUSE OF DEATH PART I	a. Immediate cause Pending Further Study					
	b. Due to or as a consequence of					
	c. Due to or as a consequence of					
PART II	Other significant conditions contributing to death but not operating in the underlying cause given in Part I. Include operation information.					
7a. Injury Date (mm dd yyyy)	7b. Time <input type="checkbox"/> AM <input type="checkbox"/> PM	7c. At Work <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	7d. Place of Injury - city, county, location, street, etc.			
7e. Location						
7f. How Injury Occurred						
7g. <input type="checkbox"/> Transportation Injury Specify <input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify _____	8. Manner of Death <input checked="" type="checkbox"/> Pending further study <input type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Undetermined		9. Autopsy <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Autopsy Performed by Law <input type="checkbox"/> No Autopsy	10. On the basis of examination for investigation, in my opinion, death occurred due to the factors and conditions specified below. Coroner Signature: <i>Kristin A. Roman</i> M.D. Date: AUG-11-2019 Coroner Title: KRISTIN A. ROMAN Medical Examiner Medical Examiner County Clerk: CHINA J. BARNETT		
11a. Usual Residence State US Virgin Islands	11b. County St. Thomas	11c. City or Town St. Thomas	11d. Mailing Address 1000 Saint James Island	11e. ZIP Code 00902	11f. Is the City Under? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12. Date of Birth (Month) (Day) (Year-yyyy) January 20 1943	13. Age at last birthday (years) 66		14. Social Security No. 3348			
15a. Usual Occupation (Type of work done during last year of working life. Do not use "retired") Consultant	15b. Kind of business or profession	15c. Occupation or SIC Code				
17. Birthplace (City & State or Foreign Country) Brooklyn, New York	18. Education (Check the box and check description, by highest degree or level of schooling completed at the time of death) <input type="checkbox"/> No graduate work, none <input type="checkbox"/> Some college work, but no degree <input type="checkbox"/> Bachelor's degree (e.g., BA, BS) <input type="checkbox"/> Master's degree (e.g., MA, MS, MEd, MEng, MHA) <input type="checkbox"/> Doctoral degree (e.g., MD, DDS, DVM, LL.M., JD)					
19. Ever in U.S. Armed Forces? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	20. Marital Partnership Status at time of death <input type="checkbox"/> Married <input type="checkbox"/> Domestic Partnership <input type="checkbox"/> Divorced <input type="checkbox"/> Married, but separated <input type="checkbox"/> Never Married <input type="checkbox"/> Widowed <input type="checkbox"/> Other, Specify _____		21. Surviving Spouse's Name (Last name, name prior to first marriage) (First, Middle, Last) Paula Sloski			
22. Father's Name (First, Middle, Last) Seymour Epstein	23. Mother's Name (Last name, name prior to first marriage) (First, Middle, Last) Paula Sloski					
24a. Informant's Name Mark Epstein	24b. Relationship to Decedent Brother	24c. City & State NY		24d. ZIP Code 33411-8218		
25a. Method of Disposition <input type="checkbox"/> Burial <input checked="" type="checkbox"/> Cremation <input type="checkbox"/> Entombment <input type="checkbox"/> City Cemetery <input type="checkbox"/> Other Specify _____			25b. Place of Disposition (Name of cemetery, crematory, other place)			
25c. Location of Disposition (City & State or Foreign Country)			25d. Date of Disposition mm dd yyyy 08 13 2019			
26a. Funeral Establishment			26b. Address (Street and Number) City & State ZIP Code 1076 Madison Ave New York, NY 10028-0237			

(To be filed in by the OCME)

 (To be filed in by Funeral Director or, in case of City burial, by OCME)

EVT201908377726

Gretchen Van Wye
 Gretchen Van Wye, Ph.D., City Registrar as of 8/1/18

August 11, 2019
Steven P. Schwartz
 Steven P. Schwartz, Ph.D., City Registrar

This is to certify that the foregoing is a true copy of a record on file in the Department of Health and Mental Hygiene. The Department of Health and Mental Hygiene does not certify to the truth of the statements made thereon, as no inquiry as to the facts has been provided by law.

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EXHIBIT

2

THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK - DEPARTMENT OF HEALTH AND MENTAL HYGIENE
 AUG-11-2019 07:36 PM CERTIFICATE OF DEATH Certificate No. 156-19-032838

19 AUG 15 2019
 SUPERIOR COURT
 THE VICE-CHANCELLER

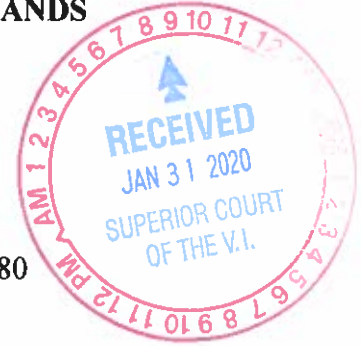
1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD EPSTEIN**
 (First, Middle, Last)

Place of Death Manhattan	2a. New York City 2b. Borough	3c. Type of Place 1 <input type="checkbox"/> Hospital Inpatient 2 <input checked="" type="checkbox"/> Emergency Dept./Outpatient 3 <input type="checkbox"/> Decedent's Residence 4 <input type="checkbox"/> Nursing Home/Long Term Care Facility 5 <input type="checkbox"/> Hospice Facility 6 <input type="checkbox"/> Decedent's Residence 7 <input type="checkbox"/> Other Specify	2d. Any Hospice care in last 30 days 1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No 3 <input type="checkbox"/> Unknown	3e. Name of hospital or other facility (if not facility, street address) New York-Presbyterian-Lower Manhattan Hospital
Date and Time of Death or Found Dead August 10 2019 7:36 AM	3a. (Month) (Day) (Year-yyyy)	3b. Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	4. Sex Male	5. OCME Case No. M19019432
6. Cause of Death a. Immediate cause Pending Further Study b. Due to or as a consequence of c. Due to or as a consequence of Other significant conditions contributing to death but not resulting in the underlying cause given in Part I. Include operation information.				
7a. Injury Date (mm dd yyyy) 7b. Time <input type="checkbox"/> AM <input type="checkbox"/> PM 7c. At Work <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 7d. Place of Injury - all fields, include street no. 7e. Location				
7f. How Injury Occurred 7g. If Transportation Injury Specify <input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify				
8. Manner of Death <input checked="" type="checkbox"/> Pending further study <input type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Undetermined				
9. Autopsy <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No autopsy performed <input type="checkbox"/> No autopsy				
10. On the basis of examination and/or investigation, in my opinion, death occurred due to Cause of Death Signature: <i>Justin Roman</i> Justin Roman M.D. Date: AUG-11-2019 Justin Roman Medical Examiner Medical Director, County Clerk (Case Medical Examiner)				
11a. Usual Residence State US Virgin Islands	11b. County St. Thomas	11c. City or Town St. Thomas	11d. Block or Precinct St. John's James Island	11e. State City/Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
12. Date of Birth (Month) (Day) (Year-yyyy) January 20 1943	13. Age at last birthday (years) 66	14. Social Security No. 3348		
15a. Usual Occupation (Type of work done during last of preceding 12 months) Consultant	15b. Kind of business or profession Finance	16. Address of decedent		
17. Birthplace (City & State or Foreign Country) Brooklyn, New York	18. Education (Check the box that best describes the highest degree or level of schooling received at the time of death) <input type="checkbox"/> No grade or less; none <input type="checkbox"/> Some college degree, but no degree <input type="checkbox"/> Bachelor's degree (e.g., BA, BS) <input type="checkbox"/> Master's degree (e.g., MA, MS, MEd, MEng, MEd, MEd, MEd) <input type="checkbox"/> Doctoral degree (e.g., MD, DDS, DVM, LL.M., JD)			
19. Ever in U.S. Armed Forces? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	20. Marital Partnership Status at time of death 1 <input type="checkbox"/> Married 2 <input type="checkbox"/> Domestic Partnership 3 <input type="checkbox"/> Divorced 4 <input type="checkbox"/> Married, but separated 5 <input type="checkbox"/> Never married 6 <input type="checkbox"/> Widowed 7 <input type="checkbox"/> Other, Specify	21. Spouse's Name (Last, First, Middle, Last) Paula Sidorovsk		
22. Father's Name (First, Middle, Last) Seymour Epstein		23. Mother's Name (Last, First, Middle, Last) Paula Sidorovsk		
24a. Informant's Name Mark Epstein	24b. Relationship to Decedent Brother	24c. City & State	24d. ZIP Code 33411-8219	
25a. Method of Disposition 1 <input type="checkbox"/> Burial 2 <input type="checkbox"/> Cremation 3 <input type="checkbox"/> Entombment 4 <input type="checkbox"/> City Cemetery 5 <input type="checkbox"/> Other Specify				
25b. Location of Disposition (City & State or Foreign Country)			25c. Date of Disposition mm dd yyyy 08 13 2019	
26a. Funeral Establishment		26b. Address (Street and Number) City & State ZIP Code 1076 Madison Ave New York, NY 10028-0237		

(To be filled in by the OCME)
 (To be filled in by the OCME)
 (To be filled in by the OCME)

EVT20190837726
 Gretchen Van Wye, Ph.D., City Registrar as of 8/1/18
 August 11, 2019
 Steven P. Schwartz, Ph.D., City Registrar
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 Y01383215

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



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

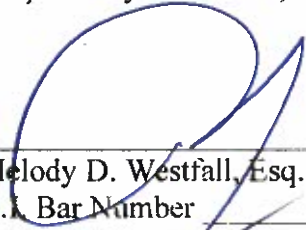
Case No. ST-19-PB-80

**Notice of Filing of Motion to Proceed Anonymously
in Filing a Notice of Claim for Unliquidated and Unsecured Damages**

COME NOW, the undersigned counsel, on behalf of Claimant Jane Doe IV, a victim of the Estate of Jeffrey E. Epstein, and submit for the consideration of the Court, the attached Motion to Proceed Anonymously in Filing a Notice of Claim for Unliquidated and Unsecured Damages.

Dated: Christiansted, St. Croix
January 31, 2020

Respectfully Submitted,

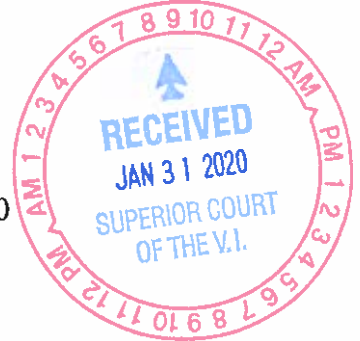


Melody D. Westfall, Esq.
V.I. Bar Number R2052
WESTFALL LAW PLLC
5032 Anchor Way, Suite 8
Christiansted, St. Croix 00820
mwestfall@westfalllaw.com
(340) 227-0017
Attorneys for Claimant Jane Doe IV

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

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

Case No. ST-19-PB-80



**Motion to Proceed Anonymously in Filing a
Claim for Unliquidated and Unsecured Damages**

COME NOW, the undersigned counsel, on behalf of Claimant Jane Doe IV (“Claimant”), a victim of the Estate of Jeffrey E. Epstein (the “Estate”), and file this Motion to Proceed Anonymously in Filing a Notice of Claim for Unliquidated and Unsecured Damages, and in support thereof state:

1. This motion and the subsequent notice of claim are timely and properly filed pursuant to Virgin Islands Probate and Fiduciary Rule 11 titled Notice to Creditors and Persons Indebted to the Estate which notes that "...all persons having claims against the estate [are] to present, or deliver to the executor or administrator, their claim(s), verified by affidavit, to a place within the territory specific in the notice, within six months from the date of notice..." as such a notice was dated September 13, 2019, filed on September 18, 2019 and directed such claims to be presented to the offices of their attorneys or the Clerk of this Court. See also 15 V.I.C. § 391 Publication of Notice of Administration.

2. The undersigned currently represents twelve victims, including Claimant, who has a claim to be made against the Estate of Jeffrey E. Epstein. On December 3, 2019, nine of those twelve victims, including Claimant, filed suit against the above-referenced Estate and its executors in the Supreme Court of the State of New York, County of New York. See Jane Doe I et al v.

Darren K. Indyke et al (Index No.: 950230/2019) (Hon. George J. Silver, J.S.C.). A true and correct copy of the Summons and Verified Complaint are attached hereto as Exhibit "1".

3. It is important to note that in that complaint, Claimant filed anonymously using the "Jane Doe" pseudonym.

4. Furthermore, on December 5, 2019, Bennet J. Moskowitz of Troutman Sanders LLP, attorneys for the executors of the Estate, filed a stipulation with request to so order Claimant's requests for anonymity on consent from all parties involved in that litigation. Attached hereto as Exhibit "2" is a true and correct of the fully executed stipulation.

5. The only reason that this stipulation has not been so ordered at this time is due to the current Administrative Stay placed on the case, and all other cases of similar nature, pending in the Supreme Court. Attached hereto as Exhibit "3" is a true and correct copy of the Administrative Order of Hon. George J. Silver, J.S.C.

6. Accordingly, the undersigned respectfully requests that this Court also grant Claimant the ability to present her Notice of Claim anonymously under pseudonym.

7. If the fact that both of the parties in this proceeding have already agreed for Claimant to file anonymously is not persuasive enough, courts in this Circuit have also granted such relief even when it is opposed.

8. First and foremost, this sort of decision is within the direct purview of this Court. See Doe v. C.A.R.S. Protection Plus, Inc., 527 F.3d 358, 371 (3rd Cir. 2008) ("[T]he decision whether to allow a [claimant] to proceed anonymously rests within the sound discretion of the court.").

9. Indeed, in making such decisions, courts in this circuit have continually applied a balancing test type approach using several factors outlined by the Third Circuit in the case of Doe

v. Megless and its progeny. See Doc v. Megless, 654 F.3d 404 (3rd Cir. 2011) (“Megless”); see also D.M. v. Cty. of Berks, 929 F. Supp. 2d 390 (E.D. Pa. 2013) (“Berks”); Doe v. Rutgers, 2019 U.S. Dist. LEXIS 75139 (D.N.J. 2019) (“Rutgers”).

10. In this case, it is clear that when applying the nine Megless factors (six that favor anonymity and three that disfavor anonymity), an overwhelming majority of them support Claimant’s use of a pseudonym while the few that do not are either not applicable to the case or do not do enough to tip the scales. See Megless, 654 F.3d at 409.

11. Regarding the first factor in favor of anonymity, the facts of this case stand in sharp contrast to instances where courts have found that anonymity would be futile because the movant’s name was already widely known. See Rutgers at 5-6 (citing to Megless at 410 ([movant’s] name, picture and home address had been disclosed on a publicly circulated flyer)). Here, the facts align more with Rutgers as Claimant has gone above and beyond to maintain her confidentiality, which has never been made public, including by filing her lawsuit as a “Jane Doe” and stipulating with the Estate to the same. See Megless at 410; see also Rutgers, 2019 U.S. Dist. LEXIS 75139 at 5.

12. Second, as for the reasonableness of the harm that the litigant is seeking to avoid, here, similar to the facts of Rutgers, Claimant wishes to proceed anonymously in order to protect her mental and physical health and right to fully and fairly litigate this action. See Rutgers at 6-7; see also Doe v. Roman Catholic Archdiocese of New York, 64 Misc. 3d 1220(A) (Sup Ct., Westchester Cty. 2019).

13. Indeed, as opposed to using a pseudonym merely to avoid the annoyance and criticism that may attend any litigation, Claimant seeks to proceed anonymously to preserve her privacy in this matter of a sensitive and highly personal nature that will have a lifelong impact on her and her families’ lives. See Rutgers at 6-7; see also Doe v. Szul Jewelry Inc., 2008 NY Misc.

LEXIS 8733 (Sup. Ct., New York Cty. 2008): Doe v. New York Univ., 6 Misc. 3d 866 (Sup. Ct., New York Cty. 2004); Sealed Plaintiff v. Sealed Defendant, 537 F.3d 185 (2nd Cir. 2008).

14. Third, unlike Megless where the District Court recognized that there is no allegation that falsely create suspicious person alert are a widespread problem, here the facts are more similar to Berks in that disallowing anonymity would likely deter those who have been falsely accused of sexual abuse from vindicating their rights due to the stigma that invariably attaches from having one's name publicly attached to such a deplorable act. See Megless at 410; see also Berks, 929 F. Supp. 2d at 402.

15. Fourth, similar to Rutgers, there is a strong chance that this claim will not be resolved on its merits if the litigant is denied the opportunity to proceed using a pseudonym as Claimant will potentially sacrifice a potentially valid claim simply to preserve her anonymity. See Rutgers at 7-8. The Court here should decide in conformity with the court in Rutgers where they agreed with the movant's argument that the public is harmed when alleged abuse goes unchallenged because movant's fear litigating publicly. See id.

16. As for the final factor weighing in favor of anonymity, Claimant is not seeking to use a pseudonym for nefarious reasons, nor has there been any allegations that Claimant has an illegal or ulterior motive in her desire to hide her name. See Megless at 411; see also Rutgers at 10. As opposed to simple public humiliation and embarrassment, which have been determined not to be sufficient grounds for allowing a Claimant to proceed anonymously, in this case, there is no "illegitimate ulterior motive", because, as referenced above, identification of Claimant's true identity "poses a risk of mental or physical harm" and the case involves "information of the utmost intimacy". See Megless at 411; see also Rutgers at 10; Doe, 2008 NY Misc. LEXIS at 16-17; Doe, 6 Misc. 3d at 879; Sealed Plaintiff, 537 F.3d at 189-190; 1991 McKinney's Session Laws of New

York 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").

17. Furthermore, even when turning to the other side of the scale and the factors disfavoring anonymity, Claimant still comes out ahead.

18. While Claimant acknowledges that there is a thumb on the scale that is the universal interest in favor of open judicial proceedings, she is not asking the record to be sealed, rather simply to proceed anonymously.

19. Next, the Court must consider "whether, because of the subject matter of this litigation, the status of a litigant as a public figure, or otherwise, there is a particularly strong interest in knowing the litigant's identities." See Megless at 411; see also Rutgers at 12. Here, the Claimant is not a public figure.

20. This litigation also involves "a member of a particularly vulnerable class" or "the subject matter is highly personal," the "public has an interest in protecting the identity of the litigant." See Rutgers at 12 (citing to Doe v. Rider Univ., 2018 U.S. Dist. LEXIS 133146 (D.N.J. 2018)). Here, Claimant alleges that she is a victim of sexual assault, so allowing her to proceed as a "Jane Doe" while preserving the public's right to access the docket and proceedings in this case strikes the appropriate balance between these competing interests. See Rutgers at 12 (citing to L.A. v. Hoffman, 2015 U.S. Dist. LEXIS 94564 (D.N.J. 2015) (granting [movant's] motion to proceed anonymously and observing that "although the identities of the [movants] will not be included in the filings in this matter, the public will maintain access to the docket and filings in this case.")).

21. Finally, the last factor weighing against disclosure is not applicable as there is no party opposing the use of a pseudonym.

therefore prevented plaintiffs from commencing this lawsuit before his death. By using threats in accompaniment with his wealth and power, Epstein was able to escape punishment for his intolerable and brutal crimes against countless young women and underage girls, including plaintiffs, for the duration of his life.

14. The plaintiffs intend to take full discovery of the Estate of Jeffrey Epstein and all associates, family members and friends to determine who knew what and when.

15. At all material times herein mentioned, Epstein, and his associates, operated, transacted business, owned, used, maintained and/or possessed real and other property, equipment and apparatus within New York City, which he utilized as the base of his operations for his sexual exploitation of minor girls and women, including plaintiffs herein.

PARTIES

16. Several of the named plaintiffs, victims of sex trafficking and sexual abuse, have been identified by pseudonym because this matter is of a highly sensitive and personal nature, and public disclosure of their identities may subject them to further humiliation, shame, and emotional distress.¹

17. Plaintiffs are all United States citizens, domiciled in New York and several other States.

18. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and

¹ Plaintiffs use a pseudonyms because they are victims of sex crimes pursuant to N.Y. Civ. Rights § 50-b and other statutory and common law principles.

and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

68. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

69. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

70. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

71. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

72. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 71., inclusive, with the same force and effect as if hereafter set forth at length.

73. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,** act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

74. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

75. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

76. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

77. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

78. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

79. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

80. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 79., inclusive, with the same force and effect as if hereafter set forth at length.

81. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

82. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

83. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

84. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

85. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

86. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS FOR A SEVENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

87. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 86., inclusive, with the same force and effect as if hereafter set forth at length.

88. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

89. In or about 2003, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe III when she was a minor child.

90. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

91. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

92. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

93. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

94. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

95. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN EIGHTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

96. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 95., inclusive, with the same force and effect as if hereafter set forth at length.

97. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

98. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

99. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

100. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

101. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

102. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

103. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A NINTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

104. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 103., inclusive, with the same force and effect as if hereafter set forth at length.

105. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

106. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

107. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

108. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

109. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

110. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

111. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 110., inclusive, with the same force and effect as if hereafter set forth at length.

112. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

113. In or about 2001, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe IV when she was a minor child.

114. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

115. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

116. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

117. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

118. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

119. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN ELEVENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

120. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 119., inclusive, with the same force and effect as if hereafter set forth at length.

121. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

122. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

123. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

124. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

125. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

126. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

127. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWELTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

128. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated I. through 127., inclusive, with the same force and effect as if hereafter set forth at length.

129. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

130. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

131. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

132. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

133. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

134. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A THIRTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

135. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 134., inclusive, with the same force and effect as if hereafter set forth at length.

136. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

137. In or about 2004, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe V when she was nineteen-years-old.

138. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

139. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

140. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

141. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

142. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

143. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTEENTH CAUSE OF ACTION FOR ASSAULT
OF JANE DOE V AS TO DEFENDANT JEFFREY EDWARD EPSTEIN**

144. Plaintiffs repeat, reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 143., inclusive, with the same force and effect as if hereafter set forth at length.

145. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

146. Epstein's predatory, sexual and unlawful acts against plaintiff, created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

147. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

148. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

149. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

150. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

151. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTEENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

152. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1, through 151., inclusive, with the same force and effect as if hereafter set forth at length.

153. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

154. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

155. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

156. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

157. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

158. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

159. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 158., inclusive, with the same force and effect as if hereafter set forth at length.

160. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,** act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

161. In or about 2001 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VI when she was approximately nineteen-years-old.

162. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

163. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

164. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

165. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

166. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

167. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SEVENTEENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

168. Plaintiffs repeat, reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 167., inclusive, with the same force and effect as if hereafter set forth at length.

anguish; all other monetary and/or non-monetary losses suffered by plaintiffs; and that by reason of the foregoing, plaintiffs sustained damages in a sum, pursuant to C.P.L.R. §3017, which exceeds the jurisdictional limits of all lower courts;

D. An award of punitive damages;

E. An award of costs that plaintiffs have incurred in this action, as well as plaintiffs' reasonable attorney's fees to the fullest extent permitted by law; and.

F. Such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: 

Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,

Index No.: _____/19

Plaintiffs,

**ATTORNEY
VERIFICATION**

-against-

**DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,**

Defendants.

-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of
New York State, and a member of the firm **MERSON LAW, PLLC**, attorneys for the
plaintiffs in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same
is true to his own knowledge, except as to the matters therein stated to be alleged upon
information and belief, and that as to those matters he believes it to be true;

That the sources of his information and knowledge are investigations and records in the
file; and,

That the reason this verification is made by affirmant and not by the plaintiffs is that the
plaintiff are not within the County where the attorney has his office.

Dated: New York, New York
December 3, 2019



JORDAN K. MERSON

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV,
JANE DOE V, JANE DOE VI, JANE DOE VII, JANE DOE VIII
and JANE DOE IX,

Plaintiffs,

- against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

Defendants.

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC

Attorneys for Plaintiffs

Office and P.O Address, Telephone

150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

To All Parties

EXHIBIT

2

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X
JANE DOE I, *et al.*, :
 :
 :
 Plaintiffs. : Index No. 950230/2019
 :
 : Hon. George J. Silver
 :
 - against - :
 : **STIPULATION AND**
 : **[PROPOSED] ORDER**
 : **ON PLAINTIFFS'**
 : **ANONYMITY**
 DARREN K. INDYKE and RICHARD D. KAHN, in :
 their capacities as the executors of the ESTATE OF :
 JEFFREY EDWARD EPSTEIN, :
 : (Motion Seq. 001)
 Defendants. :
----- X

IT IS HEREBY STIPULATED AND AGREED. by and between the undersigned attorneys, that any person subject to this Order, including the parties to this action and their respective counsel of record, shall adhere to the following terms:

1. Within three (3) days of entry of this Order, Counsel of Record for Plaintiffs shall disclose Plaintiffs' identities to Counsel of Record for Defendants, in writing.
2. Counsel of Record for Defendants may disclose Plaintiffs' identities only to Defendants and any attorneys, paralegals, and clerical or other assistants working with or for Defendants on matters related to this action; and the recipients of such information shall not disclose it to any other persons.
3. If Defendants wish to disclose Plaintiffs' identities to any person not otherwise permitted to receive such information under this Order, Defendants are limited to doing so in connection with defending this action, and must require such person to first execute a non-disclosure agreement, in a form agreed to by the parties, that prevents such person from disclosing Plaintiffs' identities to any other persons. Defendants must maintain a list of all such persons to whom Plaintiffs' identities are disclosed and copies of the executed non-disclosure agreements, all of which are subject to *in camera* inspection.
4. All portions of pleadings, motions or other papers filed with the Court that disclose Plaintiffs' identities shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. All parties shall use their best efforts to minimize such sealing. Any party filing a motion or any other papers with the Court under seal

shall also publicly file a redacted copy of the same, via NYSCEF, that redacts the Plaintiffs' identities and text that would reveal Plaintiffs' identities.

5. The parties may seek to modify or amend this Order at any time upon motion to the Court or by stipulation.
6. Motion Seq. 001 is resolved by entry of this Order; and the hearing on Motion Seq. 001 currently set for December 17, 2019 at 3:00 p.m. is canceled.

AND IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in counterparts; and facsimile signatures are deemed originals.

Dated: New York, New York
December 5, 2019

MERSON LAW, PLLC

TROUTMAN SANDERS LLP

By: Jordan Merson
Jordan K. Merson
150 East 58th Street, 34th Floor
New York, NY 10155
(212) 603-9100

Attorneys for Plaintiffs

By: Bennet J. Moskowitz / K.B.
Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
(212) 704-6000

*Attorneys for Defendants Darren K. Indyke and
Richard D. Kahn, Co-Executors of the Estate of Jeffrey
E. Epstein*

SO ORDERED.

Date: _____
New York, New York

HON. GEORGE J. SILVER, J.S.C.

EXHIBIT

3



STATE OF NEW YORK
UNIFIED COURT SYSTEM
111 CENTRE STREET
NEW YORK, N.Y. 10013
(646) 386-4200

LAWRENCE K. MARKS
Chief Administrative Judge

GEORGE J. SILVER
Deputy Chief Administrative Judge
New York City Courts

ADMINISTRATIVE ORDER #371
AMENDED

By the authority vested in me as Deputy Chief Administrative Judge of the courts within New York City, and as the coordinating judge of all cases filed under the Child Victims Act¹ (the "CVA") within that jurisdiction, I hereby order as follows:

1. This Order applies to all cases filed or hereafter filed in the Supreme Courts in and for the counties of Bronx, Kings, New York, Queens, and Richmond pursuant to the CVA, including any such matters filed before the one-year window commenced on August 14, 2019, and which were then stayed pending the opening of the window on August 14, 2019.
2. While a steering committee negotiates a Case Management Order to address the efficient prosecution and defense of cases filed under the CVA, all Preliminary Conferences currently scheduled or requested as of the effective date of this Order, and any requests for Preliminary Conferences made after the effective date of this Order are adjourned to a control date of January 31, 2020.²
3. The time to respond to any discovery demands served by the parties as of the effective date of this Order is adjourned without a date. No demands for discovery shall be served by any party until further Order of this Court.
4. Plaintiffs' time to respond to stipulations and orders that consent to or direct the production of identifying information, consisting of a plaintiff's name (including maiden name, if any), date of birth, social security number, parents and/or guardian's names, current address, and address at the time of the alleged abuse, for plaintiffs proceeding under pseudonyms is extended to December 20, 2019. Plaintiffs shall provide such identifying information to

¹ L. 2019 c.11.

² Parties may make an application to extend this, and other deadlines, as necessary.

defense counsel in a manner other than disclosure in a public filing on NYSCEF and as agreed to by the parties. Nothing in this Order prevents plaintiffs from voluntarily providing such identifying information at any time.

5. All papers in opposition to any Order to Show Cause or Notice of Motion, including motions to dismiss under CPLR §3211 or §3212, but excluding motions to proceed anonymously or by pseudonym, are adjourned until January 31, 2020. Should the motion(s) not be resolved and withdrawn by the parties as of that date, the Court will set any additional due dates as necessary. No motions, other than motions to proceed anonymously or by pseudonym, shall be filed prior to January 31, 2020 without permission of the Court. As such, no motions to dismiss under CPLR §3211 or §3212 shall be filed prior to January 31, 2020.
6. The time to answer, move against, or otherwise respond to any complaint that has been served as of the effective date of this Order is extended until further Order of the Court. This Order supersedes any due dates for answers or motions previously stipulated to by the parties and/or ordered by this Court.
7. The time to answer, move against, or otherwise respond to any complaint that is served after the effective date of this Order, but prior to January 31, 2020, shall be extended until a date stipulated to by the parties or as directed by further Order of the Court.
8. Notwithstanding any stipulation or Court Order to the contrary, no motion to sever shall be filed prior to January 31, 2020. Consistent with the CPLR, motions to sever may be filed after January 31, 2020.
9. Counsel shall make a good faith effort to resolve any motions to dismiss or motions to sever prior to filing such motions.

Dated: December 11, 2019



Hon. George J. Silver
Deputy Chief Administrative Judge
New York City Courts

THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK - DEPARTMENT OF HEALTH AND MENTAL HYGIENE
AUG-11-2019 07:36 PM CERTIFICATE OF DEATH Certificate No. 158-19-032838

19 AUG 15 PM 11 10
SUPERIOR COURT
THE VIRGIN ISLANDS

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD EPSTEIN**
(First, Middle, Last)

Place of Death 2a. New York City 2b. Borough Manhattan	2c. Type of Place 1 <input type="checkbox"/> Hospital Inpatient 2 <input checked="" type="checkbox"/> Emergency Dept./Outpatient 3 <input type="checkbox"/> Dead on Arrival 4 <input type="checkbox"/> Nursing Home/Long Term Care Facility 5 <input type="checkbox"/> Hospice Facility 6 <input type="checkbox"/> Decedent's Residence 7 <input type="checkbox"/> Other Specify _____	2d. Any Hospice care in last 30 days 1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No 3 <input type="checkbox"/> Unknown	2e. Name of hospital or other facility (if not facility, street address) New York-Presbyterian-Lower Manhattan Hospital
Date and Time of Death or Found Dead 3a. (Month) August 3b. (Day) 10 3c. (Year-yyyy) 2019 3d. Time 7:36 3e. AM <input type="checkbox"/> PM <input checked="" type="checkbox"/>	4. Sex Male	5. OCME Case No. M19019432	
6. ICD-10 Cause of Death a. Immediate Cause Pending Further Study b. Due to or as a consequence of _____ c. Due to or as a consequence of _____ Other significant conditions contributing to death but not resulting in the underlying cause given in Part I. Include operation information.			
7. Injury Date (Month, day, yyyy) _____ 7b. Time <input type="checkbox"/> AM <input type="checkbox"/> PM 7c. At Work <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 7d. State of Injury - All injuries, fractures, street, etc. 7e. Location _____			
7f. How Injury Occurred _____			
7g. If Transportation Injury Specify <input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify _____			
8. Manner of Death <input checked="" type="checkbox"/> Pending further study <input type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Unintentional			
9. Autopsy <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (specify) _____			
10. On the basis of examination and/or investigation, in my opinion, death occurred due to _____ D.C. M.D. Date AUG-11-2019 Signature: Barbara Roman Center Name: KATONAH RODMAN Medical Examiner (Medical Examiner, Deputy Chief, Chief Medical Examiner)			
11a. Usual Residence State US Virgin Islands	11b. County St. Thomas	11c. Co. or town St. Thomas	11d. Street or location 14th Street James Island
11e. ZIP Code 00802		11f. Inside City Limits? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12. Date of Birth (Month) (Day) (Year-yyyy) January 20 1953		13. Age at last birthday (years) 66	14. Social Security No. 3348
15a. Usual Occupation (Type of work done during most of preceding 12 months) Consultant		15b. Kind of business or industry Finance	15c. Agency or SIC# ...
17. Birthplace (City & State or Foreign Country) Brooklyn, New York			
18. Education (Check the box that best describes the highest degree or level of education attained at the time of death) 1 <input checked="" type="checkbox"/> Graduate level, none 2 <input type="checkbox"/> High school graduate or GED 3 <input type="checkbox"/> Some college credit, but no degree 4 <input type="checkbox"/> Bachelor's degree (B.A., B.S., etc.) 5 <input type="checkbox"/> Master's degree (M.A., M.S., etc.) 6 <input type="checkbox"/> Doctoral degree (e.g., M.D., D.O.B., D.V.M., LL.M., J.D.)			
19. Ever in U.S. Armed Forces? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		20. Marital Partnership Status at time of death 1 <input type="checkbox"/> Married <input checked="" type="checkbox"/> Domestic Partnership <input type="checkbox"/> Divorced 4 <input type="checkbox"/> Married, but separated <input type="checkbox"/> Never married <input type="checkbox"/> Widowed 7 <input type="checkbox"/> Other, Specify _____	
21. Surviving Spouse (Last name prior to last marriage) (First, Middle, Last) Paula Slatofsky		22. Father's Name (First, Middle, Last) Seymour Epstein	
23a. Informant's Name Mark Epstein		23b. Relationship to Decedent Brother	
23c. Address (Street and Number) City & State ZIP Code) 1076 Madison Ave New York, NY 10028-0237		23d. Place of Disposition (Name of cemetery, crematory, other place) ...	
24. Method of Disposition 1 <input type="checkbox"/> Burial <input checked="" type="checkbox"/> Cremation <input type="checkbox"/> Entombment <input type="checkbox"/> City Cemetery 5 <input type="checkbox"/> Other Specify _____		25. Date of Disposition mm dd yyyy 08 13 2019	
25a. Funeral Establishment ...		25b. Address (Street and Number) City & State ZIP Code) 1076 Madison Ave New York, NY 10028-0237	

(To be filled in by the OCME)
(To be filled in by Funeral Director or, in case of City Burial, OCME)

EVT20190837726

Barbara Roman
Gretchen Van Wye, Ph.D., City Registrar as of 3/1/19

August 11, 2019

VR 18 (Rev. 01/08)

This is to certify that the foregoing is a true copy of a record on file in the Department of Health and Mental Hygiene. The Department of Health and Mental Hygiene does not certify to the truth of the statements made thereon, as no inquiry as to the facts has been provided by law.

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Steven P. Schwartz
Steven P. Schwartz, Ph.D., City Registrar



Y01383215



EXHIBIT

2

THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK - DEPARTMENT OF HEALTH AND MENTAL HYGIENE
 AUG-11-2019 07:36 PM CERTIFICATE OF DEATH Certificate No. 156-19-032838

19 AUG 15 5 15 PM '19
 SUPERIOR COURT
 THE VIRGIN ISLANDS

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD ERSTEIN**
 (First, Middle, Last)

Place of Death	2a. New York City	2b. Borough	2c. Type of Place	4 <input type="checkbox"/> Nursing Home/Long Term Care Facility	2d. Any Hospice care in last 30 days	3e. Name of hospital or other facility (if not facility, street address)
	Manhattan	1 <input type="checkbox"/> Hospital Inpatient 2 <input checked="" type="checkbox"/> Emergency Dept./Outpatient 3 <input type="checkbox"/> Dead on Arrival	5 <input type="checkbox"/> Hospice Facility 6 <input type="checkbox"/> Decedent's Residence 7 <input type="checkbox"/> Other Specify	1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No 3 <input type="checkbox"/> Unknown	New York-Presbyterian-Lower Manhattan Hospital	
Date and Time of Death or Found Dead	3a. (Month)	(Day)	(Year-yyyy)	3b. Time	AM <input checked="" type="checkbox"/> PM <input type="checkbox"/>	4. Sex
August	10	2019	7:36	Male	5. OCME Case No.	M19019432
5. C O M P A R T I	a. Immediate cause Pending Further Study					
	b. Due to or as a consequence of					
c. Due to or as a consequence of						
Other significant conditions contributing to death but not resulting in the underlying cause given in Part I. Include operation information.						
7a. Injury Date (mm dd yyyy)	7b. Time	AM <input type="checkbox"/> PM <input type="checkbox"/>	7c. At Work <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	7d. Place of Injury		
7e. How Injury Occurred						
7g. If Transportation Injury Specify	8. Manner of Death		9. Autopsy	10. On the basis of examination and/or investigation, in my opinion, death occurred due to		
<input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify	<input checked="" type="checkbox"/> Pending further study <input type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Undetermined		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No autopsy performed	Cause of Death: Heart Disease D.O.C. M.D. Date AUG-11-2019 Medical Examiner: ANTHONY J. PUGHAN Medical Examiner (City or State): ANTHONY J. PUGHAN		
11a. Usual Residence State	11b. County	11c. City or Town	11d. State of Birth	11e. ZIP Code	11f. Inside City Limits?	
US Virgin Islands	St. Thomas	St. Thomas	St. Thomas	00802	1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No	
12. Date of Birth (Month) (Day) (Year-yyyy)	13. Age at last birthday (years)	14. Social Security No.				
January 20 1943	66	-3348				
15a. Usual Occupation (Type of work done during last 12 months)	15b. Kind of business or industry	15c. Industry of SICs				
Consultant	France	...				
17. Birthplace (City & State or Foreign Country)	18. Education (Check the box that best describes the highest degree or level of schooling received at the time of death)					
Brooklyn, New York	1 <input type="checkbox"/> No schooling less than high school 2 <input type="checkbox"/> High school graduate or GED 3 <input type="checkbox"/> Bachelor's degree or B.S. 4 <input type="checkbox"/> Master's degree or M.S. 5 <input type="checkbox"/> Doctoral degree or Ph.D., Ed.D., D.B.A., D.M.A., D.F.A., J.D.					
19. Ever in U.S. Armed Forces?	20. Marital Partnership Status at time of death		21. Spouse's Name (Last name prior to first marriage) (First, Middle, Last)			
1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No	1 <input type="checkbox"/> Married 2 <input type="checkbox"/> Domestic Partnership 3 <input type="checkbox"/> Divorced 4 <input type="checkbox"/> Married, but separated 5 <input type="checkbox"/> Never married 6 <input type="checkbox"/> Widowed		Paula Stolovsky			
22. Father's Name (First, Middle, Last)			23. Mother's Name (Last name prior to first marriage) (First, Middle, Last)			
Seymour Epstein			Paula Stolovsky			
24a. Informant's Name	24b. Relationship to Decedent	24c. Informant's Address (Street and Number) City & State ZIP Code				
Mark Epstein	Brother	1076 Madison Ave New York, NY 10028-0237				
25a. Method of Disposition			25b. Date of Disposition (mm dd yyyy)			
1 <input type="checkbox"/> Burial 2 <input type="checkbox"/> Cremation 3 <input checked="" type="checkbox"/> Entombment 4 <input type="checkbox"/> City Cemetery 5 <input type="checkbox"/> Other Specify			08 13 2019			
26a. Location of Disposition (City, State or Foreign Country)			26b. Address (Street and Number) City & State ZIP Code			
			1076 Madison Ave New York, NY 10028-0237			

(To be filled in by the OCME)
 (To be filled in by the Funeral Director or, in case of City Burial, by OCME)

EVY201908377726

Bethan Vertice
 Gretchen Van Wyk, Ph.D., City Registrar as of 8/1/18

August 11, 2019

VR 18 (Rev. 07/08)

This is to certify that the foregoing is a true copy of a record on file in the Department of Health and Mental Hygiene. The Department of Health and Mental Hygiene does not certify to the truth of the statements made thereon, as no inquiry as to the facts has been provided by law.

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Steven P. Schwartz
 Steven P. Schwartz, Ph.D., City Registrar



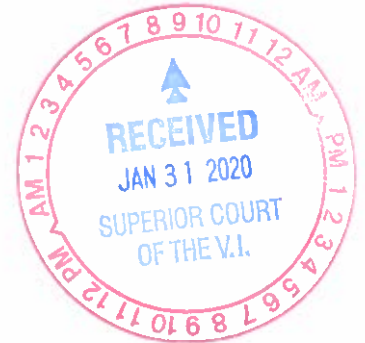
Y01383215



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

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

Case No. ST-19-PB-80

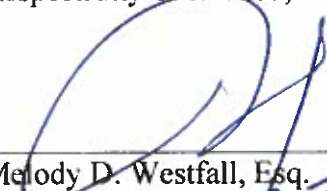


Notice of Filing of Motion to Proceed Anonymously
in Filing a Notice of Claim for Unliquidated and Unsecured Damages

COME NOW, the undersigned counsel, on behalf of Claimant Jane Doe V, a victim of the Estate of Jeffrey E. Epstein, and submit for the consideration of the Court, the attached Motion to Proceed Anonymously in Filing a Notice of Claim for Unliquidated and Unsecured Damages.

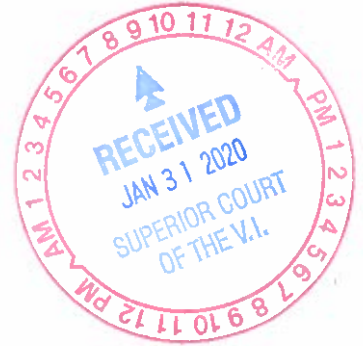
Dated: Christiansted, St. Croix
January 31, 2020

Respectfully Submitted,



Melody D. Westfall, Esq.
V.I. Bar Number 2052
WESTFALL LAW PLLC
5032 Anchor Way, Suite 8
Christiansted, St. Croix 00820
mwestfall@westfalllaw.com
(340) 227-0017
Attorneys for Claimant Jane Doe V

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



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

Case No. ST-19-PB-80

**Motion to Proceed Anonymously in Filing a
Claim for Unliquidated and Unsecured Damages**

COME NOW, the undersigned counsel, on behalf of Claimant Jane Doe V (“Claimant”), a victim of the Estate of Jeffrey E. Epstein (the “Estate”), and file this Motion to Proceed Anonymously in Filing a Notice of Claim for Unliquidated and Unsecured Damages, and in support thereof state:

1. This motion and the subsequent notice of claim are timely and properly filed pursuant to Virgin Islands Probate and Fiduciary Rule 11 titled Notice to Creditors and Persons Indebted to the Estate which notes that "...all persons having claims against the estate [are] to present, or deliver to the executor or administrator, their claim(s), verified by affidavit, to a place within the territory specific in the notice, within six months from the date of notice..." as such a notice was dated September 13, 2019, filed on September 18, 2019 and directed such claims to be presented to the offices of their attorneys or the Clerk of this Court. See also 15 V.I.C. § 391 Publication of Notice of Administration.

2. The undersigned currently represents twelve victims, including Claimant, who has a claim to be made against the Estate of Jeffrey E. Epstein. On December 3, 2019, nine of those twelve victims, including Claimant, filed suit against the above-referenced Estate and its executors in the Supreme Court of the State of New York, County of New York. See Jane Doe I et al v.

Darren K. Indyke et al (Index No.: 950230/2019) (Hon. George J. Silver, J.S.C.). A true and correct copy of the Summons and Verified Complaint are attached hereto as Exhibit "1".

3. It is important to note that in that complaint, Claimant filed anonymously using the "Jane Doe" pseudonym.

4. Furthermore, on December 5, 2019, Bennet J. Moskowitz of Troutman Sanders LLP, attorneys for the executors of the Estate, filed a stipulation with request to so order Claimant's requests for anonymity on consent from all parties involved in that litigation. Attached hereto as Exhibit "2" is a true and correct of the fully executed stipulation.

5. The only reason that this stipulation has not been so ordered at this time is due to the current Administrative Stay placed on the case, and all other cases of similar nature, pending in the Supreme Court. Attached hereto as Exhibit "3" is a true and correct copy of the Administrative Order of Hon. George J. Silver, J.S.C.

6. Accordingly, the undersigned respectfully requests that this Court also grant Claimant the ability to present her Notice of Claim anonymously under pseudonym.

7. If the fact that both of the parties in this proceeding have already agreed for Claimant to file anonymously is not persuasive enough, courts in this Circuit have also granted such relief even when it is opposed.

8. First and foremost, this sort of decision is within the direct purview of this Court. See Doe v. C.A.R.S. Protection Plus, Inc., 527 F.3d 358, 371 (3rd Cir. 2008) ("[T]he decision whether to allow a [claimant] to proceed anonymously rests within the sound discretion of the court.").

9. Indeed, in making such decisions, courts in this circuit have continually applied a balancing test type approach using several factors outlined by the Third Circuit in the case of Doe

v. Megless and its progeny. See Doe v. Megless, 654 F.3d 404 (3rd Cir. 2011) (“Megless”); see also D.M. v. Cty. of Berks, 929 F. Supp. 2d 390 (E.D. Pa. 2013) (“Berks”); Doe v. Rutgers, 2019 U.S. Dist. LEXIS 75139 (D.N.J. 2019) (“Rutgers”).

10. In this case, it is clear that when applying the nine Megless factors (six that favor anonymity and three that disfavor anonymity), an overwhelming majority of them support Claimant’s use of a pseudonym while the few that do not are either not applicable to the case or do not do enough to tip the scales. See Megless, 654 F.3d at 409.

11. Regarding the first factor in favor of anonymity, the facts of this case stand in sharp contrast to instances where courts have found that anonymity would be futile because the movant’s name was already widely known. See Rutgers at 5-6 (citing to Megless at 410 ([movant’s] name, picture and home address had been disclosed on a publicly circulated flyer)). Here, the facts align more with Rutgers as Claimant has gone above and beyond to maintain her confidentiality, which has never been made public, including by filing her lawsuit as a “Jane Doe” and stipulating with the Estate to the same. See Megless at 410; see also Rutgers, 2019 U.S. Dist. LEXIS 75139 at 5.

12. Second, as for the reasonableness of the harm that the litigant is seeking to avoid, here, similar to the facts of Rutgers, Claimant wishes to proceed anonymously in order to protect her mental and physical health and right to fully and fairly litigate this action. See Rutgers at 6-7; see also Doe v. Roman Catholic Archdiocese of New York, 64 Misc. 3d 1220(A) (Sup Ct., Westchester Cty. 2019).

13. Indeed, as opposed to using a pseudonym merely to avoid the annoyance and criticism that may attend any litigation, Claimant seeks to proceed anonymously to preserve her privacy in this matter of a sensitive and highly personal nature that will have a lifelong impact on her and her families’ lives. See Rutgers at 6-7; see also Doe v. Szul Jewelry Inc., 2008 NY Misc.

LEXIS 8733 (Sup. Ct., New York Cty. 2008); Doe v. New York Univ., 6 Misc. 3d 866 (Sup. Ct., New York Cty. 2004); Sealed Plaintiff v. Sealed Defendant, 537 F.3d 185 (2nd Cir. 2008).

14. Third, unlike Megless where the District Court recognized that there is no allegation that falsely create suspicious person alert are a widespread problem, here the facts are more similar to Berks in that disallowing anonymity would likely deter those who have been falsely accused of sexual abuse from vindicating their rights due to the stigma that invariably attaches from having one's name publicly attached to such a deplorable act. See Megless at 410; see also Berks, 929 F. Supp. 2d at 402.

15. Fourth, similar to Rutgers, there is a strong chance that this claim will not be resolved on its merits if the litigant is denied the opportunity to proceed using a pseudonym as Claimant will potentially sacrifice a potentially valid claim simply to preserve her anonymity. See Rutgers at 7-8. The Court here should decide in conformity with the court in Rutgers where they agreed with the movant's argument that the public is harmed when alleged abuse goes unchallenged because movant's fear litigating publicly. See id.

16. As for the final factor weighing in favor of anonymity, Claimant is not seeking to use a pseudonym for nefarious reasons, nor has there been any allegations that Claimant has an illegal or ulterior motive in her desire to hide her name. See Megless at 411; see also Rutgers at 10. As opposed to simple public humiliation and embarrassment, which have been determined not to be sufficient grounds for allowing a Claimant to proceed anonymously, in this case, there is no "illegitimate ulterior motive", because, as referenced above, identification of Claimant's true identity "poses a risk of mental or physical harm" and the case involves "information of the utmost intimacy". See Megless at 411; see also Rutgers at 10; Doe, 2008 NY Misc. LEXIS at 16-17; Doe, 6 Misc. 3d at 879; Sealed Plaintiff, 537 F.3d at 189-190; 1991 McKinney's Session Laws of New

York 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").

17. Furthermore, even when turning to the other side of the scale and the factors disfavoring anonymity, Claimant still comes out ahead.

18. While Claimant acknowledges that there is a thumb on the scale that is the universal interest in favor of open judicial proceedings, she is not asking the record to be sealed, rather simply to proceed anonymously.

19. Next, the Court must consider "whether, because of the subject matter of this litigation, the status of a litigant as a public figure, or otherwise, there is a particularly strong interest in knowing the litigant's identities." See Megless at 411; see also Rutgers at 12. Here, the Claimant is not a public figure.

20. This litigation also involves "a member of a particularly vulnerable class" or "the subject matter is highly personal," the "public has an interest in protecting the identity of the litigant." See Rutgers at 12 (citing to Doe v. Rider Univ., 2018 U.S. Dist. LEXIS 133146 (D.N.J. 2018)). Here, Claimant alleges that she is a victim of sexual assault, so allowing her to proceed as a "Jane Doe" while preserving the public's right to access the docket and proceedings in this case strikes the appropriate balance between these competing interests. See Rutgers at 12 (citing to L.A. v. Hoffman, 2015 U.S. Dist. LEXIS 94564 (D.N.J. 2015) (granting [movant's] motion to proceed anonymously and observing that "although the identities of the [movants] will not be included in the filings in this matter, the public will maintain access to the docket and filings in this case.")).

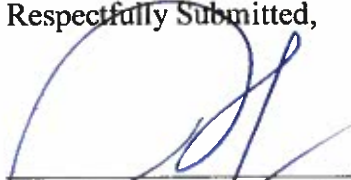
21. Finally, the last factor weighing against disclosure is not applicable as there is no party opposing the use of a pseudonym.

22. Applying the factors referenced in the litany of case law to the specific facts of Claimant's case makes clear that she should be permitted to proceed pseudonymously. She is a victim of sexual abuse, a matter of a highly sensitive and personal nature; she is not seeking to avoid mere embarrassment, but rather to protect her physical and mental well-being along; it is well known that victims of sexual crimes are often not believed and have their reputations are put into question, thus identification of her poses a serious risk of retaliatory harm to her; and, the Estate will not be prejudiced because her identity will be known to it and their counsel, and thus they will be able to properly investigate her claim. As such, the Court here should find that the totality of the factors and circumstances favor anonymity.

WHEREFORE, Claimant prays that the Court grant (a) her motion seeking the right to proceeding in this action under pseudonym in its entirety; and, (c) all other further relief as this Court may deem just and proper.

Dated: Christiansted, St. Croix
January 31, 2020

Respectfully Submitted,



Melody D. Westfall, Esq.
V.I. Bar Number PC 2057
WESTFALL LAW PLLC
5032 Anchor Way, Suite 8
Christiansted, St. Croix 00820
mwestfall@westfalllaw.com
(340) 227-0017
Attorneys for Claimant Jane Doe V

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2020, I caused a true and correct copy of the foregoing Motion to Proceed Anonymously in Filing a Claim for Unliquidated and Unsecured Damages to be served on the following:

William Blum, Esq.
KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Darren K. Indyke, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
9053 Estate Thomas, Suite 101
St. Thomas, USVI 00802

Richard Kahn, Executor
c/o KELLERHALLS FERGUSON KROBLIN PLLC
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Douglas B. Chanco, Esq.
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Daniel Mullkoff, Esq.
CUTI HECKER WANG LLP
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EXHIBIT

1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.: _____/19

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,

Plaintiffs designate
NEW YORK COUNTY
as place of trial.

Plaintiffs,

The basis of venue is the
location where a
substantial part of the
events or omissions giving
rise to these claims
occurred, the residence of
at least one plaintiff and
the residence of defendant
Kahn

-against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

SUMMONS

Defendants.

Plaintiffs reside in New
York and other States

-----X
To the above-named defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy
of your answer or, if the complaint is not served with this summons, to serve a notice of
appearance on the plaintiff's attorneys within 20 days after the service of this summons, exclusive
of the day of service (or within 30 days after the service is complete if this summons is not
personally delivered to you within the State of New York) and in case your failure to appear or
answer, judgement will be taken for the relief demanded herein.

**A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT,
NEW YORK COUNTY ON 12/3/19 IN COMPLIANCE WITH CPLR §§305(a) AND
306(a).**

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: Jordan Merson

Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

Defendants' Addresses:

**RICHARD D. KAHN, in his capacity as a co-executor
of the ESTATE OF JEFFREY EDWARD EPSTEIN**
130 East 75th Street
New York, NY 10021

**DARREN K. INDYKE, in his capacity as a co-executor
of the ESTATE OF JEFFREY EDWARD EPSTEIN**
6030 Le Lac Road
Boca Raton, FL 33496

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE
DOE IV, JANE DOE V, JANE DOE VI, JANE DOE
VII, JANE DOE VIII and JANE DOE IX,

Index No.: _____/19

Plaintiffs,

-against-

**VERIFIED
COMPLAINT**

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the ESTATE OF
JEFFREY EDWARD EPSTEIN,

Defendants.

-----X
COMPLAINT AND JURY TRIAL DEMANDED

Plaintiffs JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV, JANE DOE
V, JANE DOE VI, JANE DOE VII, JANE DOE VIII and JANE DOE IX, by and through
their counsel at MERSON LAW, PLLC, and as for their complaint in this action against
defendants DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the
executors of the ESTATE OF JEFFREY EDWARD EPSTEIN, hereby allege the following:

NATURE OF THE CLAIMS

1. Jeffrey Edward Epstein (hereinafter, "Epstein") sexually abused, assaulted and battered many women and children, including the plaintiffs herein.
2. These nine women come forward to stand up for themselves and others, after they were sexually abused and assaulted by Epstein.
3. Some of these women were raped by Epstein, repeatedly.
4. All of these women were sexually battered, assaulted, and abused by Epstein as a part of the same conduct, occurrence, plan, scheme and transaction that was perpetrated.

conducted, organized and/or performed in New York City, Palm Beach, Florida, New Mexico, the U.S. Virgin Islands and other places by Epstein and his associates.

5. Epstein orchestrated a massive sex trafficking network to obtain hundreds of girls for himself for sexual gratification, and additionally lent these girls out to other wealthy and/or powerful individuals within his network to be sexually abused.

6. As expressed by United States District Judge Kenneth Marra in his opinion in *Doe I. V. United States*, "From between 1999 and 2007, Jeffrey Epstein abused more than thirty minor girls... at his mansion in Palm Beach, Florida, and elsewhere in the United States and overseas... In addition to his own sexual abuse of the victims, Epstein directed other persons to abuse the girls sexually... Epstein worked in concert with others to obtain minors not only for his own sexual gratification, but also for the sexual gratification of others." (*Doe I. v. United States*, 359 F. Supp. 3d 1201, 1204)

7. Epstein committed sexual assault, sexual battery, intentional infliction of emotional distress and negligent infliction of emotional distress pursuant to New York common law.

VENUE, JURISDICTION AND TIMELINESS

8. The Estate of Jeffrey Epstein, which is being presided over by defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the estate of **JEFFREY EDWARD EPSTEIN**, includes a residence in New York, New York, that was occupied by Jeffrey Epstein before his death earlier this year.

9. On information and belief, this Court has personal jurisdiction over the Estate of Jeffrey Epstein pursuant to New York Civil Practice Law and Rules ("C.P.L.R.") Sections 301 and 302 because defendant **RICHARD D. KAHN** is a resident of New York, plaintiffs reside in

New York and other States, defendants operate in New York, transact business in New York, and own, use or possess real property within New York and many of the acts of sexual abuse and as part of this nefarious plan and course of conduct perpetrated by Epstein occurred in New York, New York.

10. This action has been timely filed pursuant to the Child Victims Act (CPLR § 214-g). The actions described herein constitute sexual offenses by Epstein under New York Penal Law Article 130, and were committed against several of the named plaintiffs when they were children less than eighteen years of age, for which they suffered physical, psychological and other injuries as a result.

11. This action has also been timely filed pursuant to CPLR § 215(8)(a) which provides that a plaintiff shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against Epstein with respect to the same sex trafficking enterprise and sexual conduct, including sex with minors and by force, from which plaintiffs' claims arise, was terminated on August 29, 2019.

12. Any statute of limitations applicable to plaintiffs' claims, if any, is tolled due to the continuous and active deception, duress, fraud, threats of retaliation and other forms of misconduct that Epstein and his co-conspirators used to silence his many victims, including plaintiffs. Epstein's actions deprived plaintiffs of their opportunity to commence this lawsuit before his death.

13. Defendants are equitably estopped from asserting a statute of limitations defense. Allowing defendants to do so would be unjust. Epstein and his employees intimidated each of his victims into silence by threatening their lives and their livelihoods. Epstein and his employees

therefore prevented plaintiffs from commencing this lawsuit before his death. By using threats in accompaniment with his wealth and power, Epstein was able to escape punishment for his intolerable and brutal crimes against countless young women and underage girls, including plaintiffs, for the duration of his life.

14. The plaintiffs intend to take full discovery of the Estate of Jeffrey Epstein and all associates, family members and friends to determine who knew what and when.

15. At all material times herein mentioned, Epstein, and his associates, operated, transacted business, owned, used, maintained and/or possessed real and other property, equipment and apparatus within New York City, which he utilized as the base of his operations for his sexual exploitation of minor girls and women, including plaintiffs herein.

PARTIES

16. Several of the named plaintiffs, victims of sex trafficking and sexual abuse, have been identified by pseudonym because this matter is of a highly sensitive and personal nature, and public disclosure of their identities may subject them to further humiliation, shame, and emotional distress.¹

17. Plaintiffs are all United States citizens, domiciled in New York and several other States.

18. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and

¹ Plaintiffs use a pseudonyms because they are victims of sex crimes pursuant to N.Y. Civ. Rights § 50-b and other statutory and common law principles.

responsibilities. On information and belief, the Estate of Jeffrey Epstein maintained multiple properties in the United States, including, but not limited to, New York, New York and Palm Beach, Florida.

19. Defendant Darren K. Indyke is sued in his capacity as appointed executor of the Estate of Jeffrey Edward Epstein.

20. Defendant Richard D. Kahn is sued in his capacity as appointed executor of the Estate of Jeffrey Edward Epstein.

FACTS OF THE CASE

21. Starting in or about 1990 and continuing for a period of time thereafter, when plaintiff Jane Doe I was approximately fourteen-years-old, Epstein and his associates repeatedly sexually assaulted, abused, battered and raped her.

22. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe I suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

23. Starting in or about 1985, when plaintiff Jane Doe II was twenty-three-years-old, Epstein sexually assaulted, abused, and battered her.

24. As a result of the aforementioned sexual assault, abuse and battery, plaintiff Jane Doe II suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

25. Starting in or about 2003 and continuing for a period of time thereafter, when plaintiff Jane Doe III was approximately thirteen-years-old, Epstein and his associates repeatedly sexually assaulted, abused, battered and raped her.

26. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe III suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

27. Starting in or about 2001 and continuing for a period of time thereafter, when plaintiff Jane Doe IV was approximately fifteen-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

28. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe IV suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

29. Starting in or about 2004 and continuing for a period of time thereafter, when plaintiff Jane Doe V was nineteen-years-old, Epstein sexually assaulted, abused, battered and forced her to perform oral sex on him.

30. As a result of the aforementioned sexual assault, abuse, battery and forced oral sex, plaintiff Jane Doe V suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

31. Starting in or about 2001 and continuing for a period of time thereafter, when plaintiff Jane Doe VI was nineteen-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

32. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe VI suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

33. Starting in or about 2007 and continuing for a period of time thereafter, when plaintiff Jane Doe VII was twenty-one-years-old, Epstein and his associates sexually assaulted, abused, and battered her.

34. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe VII suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

35. Starting in or about 2000 and continuing for a period of time thereafter, when plaintiff Jane Doe VIII was twenty-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

36. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe VIII suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

37. Starting in or about 2002 and continuing for a period of time thereafter, when plaintiff Jane Doe IX was twenty-two-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

38. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe IX suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

**AS AND FOR A FIRST CAUSE OF ACTION FOR
BATTERY OF JANE DOE I AS TO JEFFREY EDWARD EPSTEIN**

39. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 38., inclusive, with the same force and effect as if hereafter set forth at length.

40. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

41. In or about 1990 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe I on several occasions when she was a minor child.

42. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

43. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

44. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and Plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

45. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

46. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

47. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SECOND CAUSE OF ACTION FOR
ASSAULT OF JANE DOE I AS TO JEFFREY EDWARD EPSTEIN**

48. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 47., inclusive, with the same force and effect as if hereafter set forth at length.

49. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

50. Epstein's predatory, sexual and unlawful acts against plaintiff, created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

51. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

52. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

53. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

54. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

55. This action falls within the exceptions to Article 16 of the C.P.L.R

**AS AND FOR A THIRD CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE I AS TO JEFFREY EDWARD EPSTEIN**

56. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 55., inclusive, with the same force and effect as if hereafter set forth at length.

57. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

58. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

59. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

60. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

61. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

62. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

63. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 62., inclusive, with the same force and effect as if hereafter set forth at length.

64. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

65. In or about 1985, Jeffrey Edward Epstein sexually abused plaintiff when she was twenty-three-years-old.

66. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

67. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional

and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

68. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

69. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

70. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

71. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

72. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 71., inclusive, with the same force and effect as if hereafter set forth at length.

73. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

74. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

75. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

76. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

77. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

78. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

79. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

80. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 79., inclusive, with the same force and effect as if hereafter set forth at length.

81. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

82. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

83. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

84. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

85. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

86. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS FOR A SEVENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

87. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 86., inclusive, with the same force and effect as if hereafter set forth at length.

88. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

89. In or about 2003, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe III when she was a minor child.

90. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

91. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

92. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

93. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

94. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

95. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN EIGHTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

96. Plaintiffs repeat reiterate, and reallege each and every allegation contained in these paragraphs of the Complaint marked and designated 1. through 95., inclusive, with the same force and effect as if hereafter set forth at length.

97. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

98. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

99. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

100. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

101. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

102. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

103. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A NINTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

104. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 103., inclusive, with the same force and effect as if hereafter set forth at length.

105. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

106. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

107. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

108. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

109. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

110. This action falls within the exceptions to Article 16 of the C.P.L.R.

AS AND FOR A TENTH CAUSE OF ACTION FOR BATTERY OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN

111. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 110., inclusive, with the same force and effect as if hereafter set forth at length.

112. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,** act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

113. In or about 2001, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe IV when she was a minor child.

114. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

115. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

116. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

117. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

118. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

119. This action falls within the exceptions to Article 16 of the C.P.L.R.

AS AND FOR AN ELEVENTH CAUSE OF ACTION FOR ASSAULT OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN

120. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 119., inclusive, with the same force and effect as if hereafter set forth at length.

121. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

122. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

123. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

124. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

125. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

126. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

127. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWELTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

128. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 127., inclusive, with the same force and effect as if hereafter set forth at length.

129. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

130. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

131. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

132. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

133. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

134. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A THIRTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

135. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 134., inclusive, with the same force and effect as if hereafter set forth at length.

136. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

137. In or about 2004, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe V when she was nineteen-years-old.

138. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

139. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

140. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

141. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

142. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

143. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTEENTH CAUSE OF ACTION FOR ASSAULT
OF JANE DOE V AS TO DEFENDANT JEFFREY EDWARD EPSTEIN**

144. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 143., inclusive, with the same force and effect as if hereafter set forth at length.

145. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

146. Epstein's predatory, sexual and unlawful acts against plaintiff, created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

147. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

148. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

149. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

150. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

151. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTEENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

152. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 151., inclusive, with the same force and effect as if hereafter set forth at length.

153. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

154. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

155. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

156. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

157. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

158. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

159. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 158., inclusive, with the same force and effect as if hereafter set forth at length.

160. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,** act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

161. In or about 2001 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VI when she was approximately nineteen-years-old.

162. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

163. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

164. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

165. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

166. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

167. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SEVENTEENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

168. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 167., inclusive, with the same force and effect as if hereafter set forth at length.

169. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

170. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

171. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

172. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

173. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

174. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

175. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN EIGHTEENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

176. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 175., inclusive, with the same force and effect as if hereafter set forth at length.

177. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

178. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

179. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

180. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

181. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

182. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A NINETEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE VII AS TO JEFFREY EDWARD EPSTEIN**

183. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 182., inclusive, with the same force and effect as if hereafter set forth at length.

184. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,** act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

185. In or about 2007 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VII when she was approximately twenty-one-years-old.

186. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

187. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

188. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

189. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

190. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

191. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTIETH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VII AS TO JEFFREY EDWARD EPSTEIN**

192. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 191.. inclusive, with the same force and effect as if hereafter set forth at length.

193. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

194. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

195. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

196. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

197. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

198. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

199. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FIRST CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VII AS TO JEFFREY EDWARD EPSTEIN**

200. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 199., inclusive, with the same force and effect as if hereafter set forth at length.

201. On information and belief, defendants **DARREN K. INDYKE** and **RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

202. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

203. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

204. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

205. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

206. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SECOND CAUSE OF ACTION FOR
BATTERY OF JANE DOE VIII AS TO JEFFREY EDWARD EPSTEIN**

207. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 206., inclusive, with the same force and effect as if hereafter set forth at length.

208. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

209. In or about 2000 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VIII when she was approximately twenty-years-old.

210. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

211. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

212. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and Plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

213. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

214. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

215. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-THIRD CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VIII AS TO JEFFREY EDWARD EPSTEIN**

216. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 215., inclusive, with the same force and effect as if hereafter set forth at length.

217. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

218. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

219. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

220. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

221. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

222. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

223. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FOURTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VIII AS TO JEFFREY EDWARD EPSTEIN**

224. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 223., inclusive, with the same force and effect as if hereafter set forth at length.

225. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

226. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing. Plaintiff to suffer severe emotional distress.

227. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

228. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

229. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

230. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FIFTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

231. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 230., inclusive, with the same force and effect as if hereafter set forth at length.

232. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

233. In or about 2002 and continuing thereafter, Jeffrey Edward Epstein sexually abused Plaintiff Jane Doe IX when she was approximately twenty-two-years-old.

234. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

235. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

236. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

237. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

238. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

239. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SIXTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

240. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 239., inclusive, with the same force and effect as if hereafter set forth at length.

241. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN**, in their capacities as the executors of the **ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

242. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

243. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

244. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

245. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

246. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

247. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SEVENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

248. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 247., inclusive, with the same force and effect as if hereafter set forth at length.

249. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

250. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

251. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

252. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling Plaintiff to recover punitive damages in amounts to be proven at trial.

253. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

254. This action falls within the exceptions to Article 16 of the C.P.L.R.

WHEREFORE, plaintiffs demand judgement against defendants in such sum as a jury would find fair, adequate and just containing the following relief:

- A. A declaratory judgement that the actions, conduct and practices of defendants complained of herein violated the laws of the State of New York;
- B. An injunction and order permanently restraining defendants from engaging in such unlawful conduct;
- C. An award of damages in an amount to be determined at trial, plus prejudgment interest, to compensate plaintiffs for all monetary and/or economic harm; harm to their personal and professional reputations and loss of career fulfillment; for all non-monetary and/or compensatory harm, including but not limited to, compensation for physical anguish and mental

anguish; all other monetary and/or non-monetary losses suffered by plaintiffs; and that by reason of the foregoing, plaintiffs sustained damages in a sum, pursuant to C.P.L.R. §3017, which exceeds the jurisdictional limits of all lower courts;


D. An award of punitive damages;

E. An award of costs that plaintiffs have incurred in this action, as well as plaintiffs' reasonable attorney's fees to the fullest extent permitted by law; and.

F. Such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: 
Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,

Index No.: _____/19

Plaintiffs,

**ATTORNEY
VERIFICATION**

-against-

**DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,**

Defendants.

-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of
New York State, and a member of the firm **MERSON LAW, PLLC**, attorneys for the
plaintiffs in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same
is true to his own knowledge, except as to the matters therein stated to be alleged upon
information and belief, and that as to those matters he believes it to be true;

That the sources of his information and knowledge are investigations and records in the
file; and,

That the reason this verification is made by affirmant and not by the plaintiffs is that the
plaintiff are not within the County where the attorney has his office.

Dated: New York, New York
December 3, 2019



JORDAN K. MERSON

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE
DOE IV, JANE DOE V, JANE DOE VI, JANE DOE
VII, JANE DOE VIII and JANE DOE IX

Plaintiffs,

Index No.: _____ 19

-against-

CLIENT
VERIFICATION

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the ESTATE OF
JEFFREY EDWARD EPSTEIN,

Defendants.

-----X
STATE OF NEW YORK)

) ss.:

COUNTY OF NEW YORK)

REDACTED being duly sworn, deposes and says that:

I am a plaintiff in the within action; I have read the foregoing Complaint and
know the contents thereof; the same is true to my own knowledge, except as to the matters
therein state to be alleged on information and belief, and as to those matters I believe to
be true.

Dated: New York, New York
December 2, 2019

REDACTED

REDACTED

Sworn to before me this
2nd day of December 2019



NOTARY PUBLIC

LEIDENE APARICIO
Notary Public, State of New York
No. 01AP6371393
Qualified in Queens County
Commission Expires February 26, 2022

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV,
JANE DOE V, JANE DOE VI, JANE DOE VII, JANE DOE VIII
and JANE DOE IX,

Plaintiffs,

- against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

Defendants.

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC

Attorneys for Plaintiffs

Office and P.O. Address, Telephone

150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

To All Parties

EXHIBIT

2

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X
JANE DOE I, *et al.*,
:

Plaintiffs,
:

- against -
:

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the ESTATE OF
JEFFREY EDWARD EPSTEIN,
:

Defendants.
----- X

Index No. 950230/2019

Hon. George J. Silver

**STIPULATION AND
[PROPOSED] ORDER
ON PLAINTIFFS'
ANONYMITY**

(Motion Seq. 001)

IT IS HEREBY STIPULATED AND AGREED. by and between the undersigned attorneys, that any person subject to this Order, including the parties to this action and their respective counsel of record, shall adhere to the following terms:

1. Within three (3) days of entry of this Order, Counsel of Record for Plaintiffs shall disclose Plaintiffs' identities to Counsel of Record for Defendants, in writing.
2. Counsel of Record for Defendants may disclose Plaintiffs' identities only to Defendants and any attorneys, paralegals, and clerical or other assistants working with or for Defendants on matters related to this action; and the recipients of such information shall not disclose it to any other persons.
3. If Defendants wish to disclose Plaintiffs' identities to any person not otherwise permitted to receive such information under this Order, Defendants are limited to doing so in connection with defending this action, and must require such person to first execute a non-disclosure agreement, in a form agreed to by the parties, that prevents such person from disclosing Plaintiffs' identities to any other persons. Defendants must maintain a list of all such persons to whom Plaintiffs' identities are disclosed and copies of the executed non-disclosure agreements, all of which are subject to *in camera* inspection.
4. All portions of pleadings, motions or other papers filed with the Court that disclose Plaintiffs' identities shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. All parties shall use their best efforts to minimize such sealing. Any party filing a motion or any other papers with the Court under seal

EXHIBIT

3



STATE OF NEW YORK
UNIFIED COURT SYSTEM
111 CENTRE STREET
NEW YORK, N.Y. 10013
(646) 386-4200

LAWRENCE K. MARKS
Chief Administrative Judge

GEORGE J. SILVER
Deputy Chief Administrative Judge
New York City Courts

ADMINISTRATIVE ORDER #371
AMENDED

By the authority vested in me as Deputy Chief Administrative Judge of the courts within New York City, and as the coordinating judge of all cases filed under the Child Victims Act¹ (the "CVA") within that jurisdiction, I hereby order as follows:

1. This Order applies to all cases filed or hereafter filed in the Supreme Courts in and for the counties of Bronx, Kings, New York, Queens, and Richmond pursuant to the CVA, including any such matters filed before the one-year window commenced on August 14, 2019, and which were then stayed pending the opening of the window on August 14, 2019.
2. While a steering committee negotiates a Case Management Order to address the efficient prosecution and defense of cases filed under the CVA, all Preliminary Conferences currently scheduled or requested as of the effective date of this Order, and any requests for Preliminary Conferences made after the effective date of this Order are adjourned to a control date of January 31, 2020.²
3. The time to respond to any discovery demands served by the parties as of the effective date of this Order is adjourned without a date. No demands for discovery shall be served by any party until further Order of this Court.
4. Plaintiffs' time to respond to stipulations and orders that consent to or direct the production of identifying information, consisting of a plaintiff's name (including maiden name, if any), date of birth, social security number, parents and/or guardian's names, current address, and address at the time of the alleged abuse, for plaintiffs proceeding under pseudonyms is extended to December 20, 2019. Plaintiffs shall provide such identifying information to

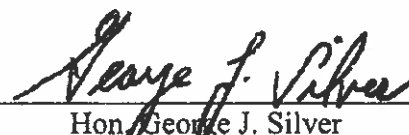
¹ L. 2019 c.11.

² Parties may make an application to extend this, and other deadlines, as necessary.

defense counsel in a manner other than disclosure in a public filing on NYSCEF and as agreed to by the parties. Nothing in this Order prevents plaintiffs from voluntarily providing such identifying information at any time.

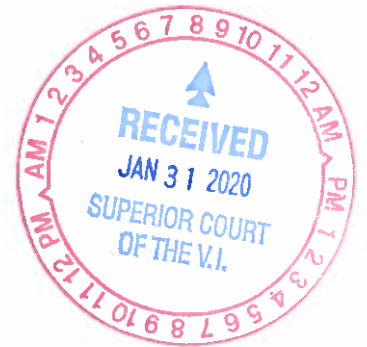
5. All papers in opposition to any Order to Show Cause or Notice of Motion, including motions to dismiss under CPLR §3211 or §3212, but excluding motions to proceed anonymously or by pseudonym, are adjourned until January 31, 2020. Should the motion(s) not be resolved and withdrawn by the parties as of that date, the Court will set any additional due dates as necessary. No motions, other than motions to proceed anonymously or by pseudonym, shall be filed prior to January 31, 2020 without permission of the Court. As such, no motions to dismiss under CPLR §3211 or §3212 shall be filed prior to January 31, 2020.
6. The time to answer, move against, or otherwise respond to any complaint that has been served as of the effective date of this Order is extended until further Order of the Court. This Order supersedes any due dates for answers or motions previously stipulated to by the parties and/or ordered by this Court.
7. The time to answer, move against, or otherwise respond to any complaint that is served after the effective date of this Order, but prior to January 31, 2020, shall be extended until a date stipulated to by the parties or as directed by further Order of the Court.
8. Notwithstanding any stipulation or Court Order to the contrary, no motion to sever shall be filed prior to January 31, 2020. Consistent with the CPLR, motions to sever may be filed after January 31, 2020.
9. Counsel shall make a good faith effort to resolve any motions to dismiss or motions to sever prior to filing such motions.

Dated: December 11, 2019



Hon. George J. Silver
Deputy Chief Administrative Judge
New York City Courts

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



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

Case No. ST-19-PB-80

Claim for Unliquidated and Unsecured Damages

COME NOW, Claimant Jane Doe V (“Claimant”), through her attorney Melody D. Westfall, Esq. of Westfall Law, PLLC, 5032 Anchor Way, Suite 8, Christiansted, St. Croix 00820, and hereby present and file this claim for unliquidated and unsecured damages from the estate in the above-referenced matter, and state as follows:

1. Prior to being arrested and brought into custody on July 6, 2019 by federal authorities in New York, the decedent, Jeffrey E. Epstein (the “Decedent”), was the subject of multiple on-going investigations into his criminal conduct including, but not limited to, his sex trafficking and sexual abuse of dozens of women, some of whom were underage. Claimant is one of those victims.

2. On information and belief, after his arrest, the decedent conspired with multiple individuals, including his attorneys and the two men named as the co-executors of his estate, to fraudulently convey and prevent the distribution of his assets to his numerous victims, including Claimant, in the event that they sought damages through civil recourse.

3. The deceased was able to do this by executing a Last Will and Testament on August 8, 2019, which included a newly formed pour-over trust known as The 1953 Trust (the “Trust”), just two days before his death by suicide on August 10, 2019. There is no doubt that these documents were set-up to defraud his creditors, including Ms. Claimant. A true and correct copy

The foregoing instrument, consisting of eleven (11) pages, was signed in our presence by Jeffrey E. Epstein and was declared by him to be his last Will. We, at the request of and in the presence of Jeffrey E. Epstein and in the presence of each other, have subscribed our names below as witnesses. We declare that we are of sound mind and of the proper age to witness a will, that to the best of our knowledge the testator is of the age of majority, or is otherwise legally competent to make a will, and appears of sound mind and under no undue influence or constraint. Under penalty of perjury, we declare these statements are true and correct on this 8th day of August, 2019 at New York, New York.

Mariela residing at [REDACTED]
Mariela A. Colón Miró
Gulnora Tali residing at [REDACTED]
GULNORA TALI

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-____
ACTION FOR TESTATE
ADMINISTRATION

19 JUL 15 PM 4:10

OATH OF WILLINGNESS TO SERVE AS EXECUTOR AND
APPOINTMENT OF LOCAL COUNSEL

I, Richard D. Kahn, hereby declare, certify, verify, and state under penalty of perjury under the laws of the United States Virgin Islands that:

1. I am an adult of sound mind, have never been convicted of any felony or of a misdemeanor involving moral turpitude, and I am not a judicial officer.
2. I am a resident of New York, New York.
3. The Last Will and Testament of Jeffrey E. Epstein nominates and appoints me as an Executor of the Estate of Jeffrey E. Epstein, deceased.
4. I am willing to act as Executor of the above-captioned Estate according to the law and to the best of my ability and I will faithfully discharge the duties and obligations of Executor.
5. I will render a true accounting of all monies and property coming into my possession for which I am responsible.
6. I am willing to act as Executor of the above-captioned Estate and request that the Court act upon and grant all the prayers of the Petition for Probate.
7. I am a non-resident of the Virgin Islands, and thus, I appoint the law office of KELLERHALS FERGUSON KROBLIN PLLC, located in the Virgin Islands, specifically at Royal Palms Professional Building, 9053 Estate Thomas, Suite 101, St. Thomas, VI 00802, as my attorney upon whom service of all papers may be made.

Richard D. Kahn

Richard D. Kahn

SUBSCRIBED AND SWORN to before

me this 15th day of August, 2019.

Marianne Barnett
NOTARY

MARIANNE BARNETT
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01BA6276845
Qualified in Suffolk County
Term expires February 25, 2021

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-____
ACTION FOR TESTATE
ADMINISTRATION

PETITION FOR PROBATE AND FOR LETTERS TESTAMENTARY

COME NOW Petitioners DARREN K. INDYKE and RICHARD D. KAHN, Executors of the Estate of Jeffrey E. Epstein, by and through KELLERHALS FERGUSON KROBLIN PLLC, and petition this Honorable Court to grant the instant petition pursuant to V.I. CODE ANN. tit. 15, § 161 and Rule 3 of the Virgin Islands Rules for Probate and Fiduciary Proceedings. In support thereof, Petitioners state the following:

- 1) That Petitioners Darren K. Indyke and Richard D. Kahn ("Petitioners") are citizens of the United States of America and residents of Florida and New York, respectively.
- 2) The original Last Will and Testament of Decedent, dated August 8, 2019, which is attached hereto, appoints Petitioners as Executors of the Estate.
- 3) The Decedent, Jeffrey E. Epstein, died testate on August 10, 2019 in New York, New York, and was domiciled in and a resident of St. Thomas, Virgin Islands at the time of his death, as supported by the copy of Certificate of Death attached hereto.¹
- 4) Decedent left certain assets in trust.
- 5) The Decedent died possessed of certain property within the Territory of the U.S. Virgin Islands and within the jurisdiction of the Court as herein described:

¹ The original death certificate, or a certified copy thereof, will be filed with the Court upon Counsel's receipt of the same.

PERSONAL PROPERTY²

VALUE

Cash	\$ 56,547,773.00
Fixed Income Investments	\$ 14,304,679.00
Equities	\$ 112,679,138.00
Aviation Assets, Automobiles and Boats	\$ 18,551,700.00
Fine Arts, Antiques, Collectibles, Valuables & Other Personal Property	TBD subject to appraisal/valuation
Hedge Funds & Private Equity Investments	\$ 194,986,301.00
10,000 shares of Maple, Inc., a U.S. Virgin Islands corporation which holds title to 9 East 71 st Street New York, NY 10021	\$ 55,931,000.00
10,000 shares of Cypress, Inc., a U.S. Virgin Islands Corporation, which holds title to 49 Zorro Ranch Road Stanley, New Mexico 87056	\$ 17,246,208.00
10,000 shares of Laurel, Inc., a U.S. Virgin Islands Corporation, which holds title to 358 El Brille Way Palm Beach, Florida 33480	\$ 12,380,209.00
999 shares of SCI JEP, a French Company which holds title to units 47 with mezzanine, 48 and 81 on the 2nd floor, units 63 and 74 on the 5 th floor and units 5 and 22 (cellars) in the basement 22 Avenue Foch Paris, France 75116	\$ 8,672,823.00
10,000 shares of Poplar, Inc., a U.S. Virgin Islands Corporation, which holds title to Great St. James Island No. 6A Red Hook Quarter St. Thomas, Virgin Islands	\$ 22,498,600.00
10,000 shares of Nautius, Inc., a U.S. Virgin Islands Corporation, which holds title to Little St. James Island No. 6B Red Hook Quarter Parcels A, B & C St. Thomas, Virgin Islands	\$ 63,874,223.00
TOTAL PERSONAL PROPERTY:	\$ 577,672,654.00
TOTAL ESTATE PROPERTY:	\$ 577,672,654.00

² Values are subject to appraisal and/or update to their date of death valuation, which will be confirmed in verified inventory to be filed with the Court.

- 6) Petitioners are investigating potential debts and claims of the Estate and at this time they are unknown.
- 7) That the names and addresses, insofar as known to Petitioners, of the heirs and next of kin of the deceased, who would be entitled to share the estate if he had left no will; the relation of each such person to him; the proportion due each such person, and whether each of them is an adult or an infant are as follows:

<u>NAMES</u>	<u>RELATIONSHIP</u>	<u>CAPACITY</u>	<u>SHARE</u>
Mark Epstein	Brother	Adult	100%

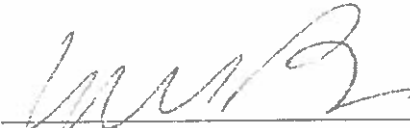
- 8) That Petitioners Darren K. Indyke and Richard D. Kahn be appointed Executors. They are adults of sound mind, are not convicted of any crime involving moral turpitude, and are not judicial officers of this Honorable Court.
- 9) Although Petitioners are not residents of the Virgin Islands, they are qualified to serve as Executors pursuant to 15 V.I.C. § 235(c) because they otherwise qualify under 15 V.I.C. § 235(a) and they have appointed the law firm of Kellerhals Ferguson Kroblin PLLC, which has offices on St. Thomas, Virgin Islands, to accept service of all papers for purposes of the probate of Decedent's estate.
- 10) The Decedent's Last Will and Testament provides that "No bond or other security shall be required of any Executor in any jurisdiction." See original Last Will and Testament attached hereto at Article THIRD, subsection B on page 2. Accordingly, Petitioners pray that the bond be waived pursuant to V.I. R. Prob. 3.

WHEREFORE, Petitioners pray:

- A. That the Estate of Jeffrey E. Epstein be entered into Probate;
- B. That a citation be issued to any heir or next of kin who has not signed a Waiver;
- C. That this Honorable Court order the issuance of a notice to creditors and claims procedure order in substantial form of that which will be separately proposed to the court forthwith;
- D. That the Last Will and Testament of Jeffrey E. Epstein, attached hereto, be admitted to Probate;
- E. That Darren K. Indyke and Richard D. Kahn be appointed Executors and Letters Testamentary be issued to them;
- F. That the bond be waived; and
- G. That the Petition be granted.

Respectfully,


DATED: August 15, 2019


WILLIAM BLUM, ESQ., Of Counsel
V.I. Bar No. 136
KELLERHALS FERGUSON KROBLIN PLLC
Royal Palms Professional Building
9053 Estate Thomas, Suite 101
St. Thomas, V.I. 00802-3602
Telephone: (340) 779-2564
Facsimile: (888) 316-9269
Email: wblum@solblum.com

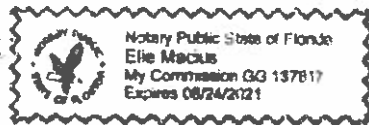
VERIFICATION OF PETITION

I, Darren K. Indyke, Executor of the Last Will and Testament of Jeffrey E. Epstein, hereby verify I have read and do hereby certify that the statements contained in the Petition for Probate and for Letters Testamentary are accurate in so far as my knowledge and insofar as my own records show.

DATED: August 17, 2019


Darren K. Indyke

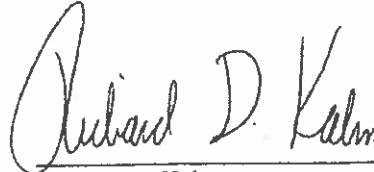
SUBSCRIBED AND SWORN to before me
this 17 day of August, 2019.



VERIFICATION OF PETITION

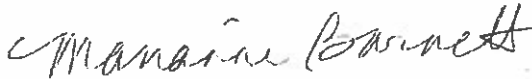
I, Richard D. Kahn, Executor of the Last Will and Testament of Jeffrey E. Epstein, hereby verify I have read and do hereby certify that the statements contained in the Petition for Probate and for Letters Testamentary are accurate in so far as my knowledge and insofar as my own records show.

DATED: August 15th, 2019



Richard D. Kahn

SUBSCRIBED AND SWORN to before me
this 15th day of August, 2019.



MARIANNE BARNETT
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01BA6276845
Qualified in Suffolk County
Term expires February 25, 2021

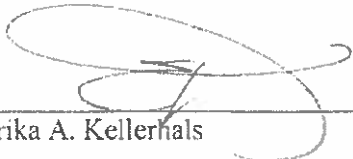
IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

19 AUG 15 PM 3:10

IN THE MATTER OF THE ESTATE OF)
JEFFREY E. EPSTEIN)
)
Deceased.)
_____)
PROBATE NO. ST-19-PB-____
ACTION FOR TESTATE
ADMINISTRATION

AFFIDAVIT

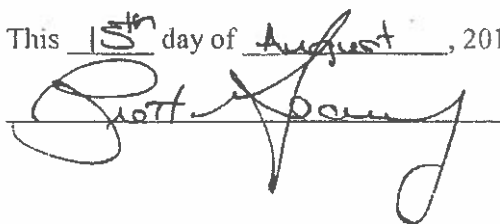
I, Erika A. Kellerhals, hereby depose or otherwise state that I do not know of any will or codicil of Jeffrey E. Epstein, deceased, other than the instrument in writing dated August 8, 2019; that I received the Last Will and Testament of Jeffrey E. Epstein from Jeffrey E. Epstein, and the said Jeffrey E. Epstein died on or about August 10, 2019.



Erika A. Kellerhals

SUBSCRIBED AND SWORN to before me

This 15th day of August, 2019.



Brett A. Geary
Notary Public: NP-144-15
Commission Expires: December 24, 2019
St. Thomas / St. John, USVI

THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK -- DEPARTMENT OF HEALTH AND MENTAL HYGIENE
 AUG-11-2019 07:36 PM **CERTIFICATE OF DEATH** Certificate No. 156-19-032838

SUPERIOR COURT
 THE VICE-CHIEF CLERK
 19 AUG 15 PM 4:10

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD EPSTEIN**
 (First, Middle, Last)

Place of Death	2a. New York City	2b. Type of Place	4 <input type="checkbox"/> Nursing Home/Long Term Care Facility	2c. Any Hospice care in last 30 days	2d. Name of hospital or other facility (if not facility, street address)
	2b. Borough Manhattan	1 <input type="checkbox"/> Hospital Inpatient 2 <input checked="" type="checkbox"/> Emergency Dept./Outpatient 3 <input type="checkbox"/> Dead on Arrival	5 <input type="checkbox"/> Hospice Facility 6 <input type="checkbox"/> Decedent's Residence 7 <input type="checkbox"/> Other Specify _____	1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No 3 <input type="checkbox"/> Unknown	New York-Presbyterian-Lower Manhattan Hospital
Date and Time of Death or Found Dead		3a. (Month) August	(Day) 10	(Year/yyyy) 2019	3b. Time 7:36
				3c. AM <input type="checkbox"/> PM <input checked="" type="checkbox"/>	4. Sex Male
					5. OCME Case No. M19019432
6. CAUSE OF DEATH a. Immediate cause Pending Further Study b. Due to or as a consequence of _____ c. Due to or as a consequence of _____ Other significant conditions contributing to death but not resulting in the underlying cause given in Part I. Include operation information.					
7a. Injury Date (mm dd yyyy) _____ 7b. Time <input type="checkbox"/> AM <input type="checkbox"/> PM 7c. At Work <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 7d. Place of Injury _____ 7e. Location _____ 7f. How Injury Occurred _____					
7g. If Transportation Injury Specify <input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify _____ 8. Manner of Death <input checked="" type="checkbox"/> Pending further study <input type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Undetermined 9. Autopsy <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No Autopsy Performed by Law <input type="checkbox"/> No Autopsy 10. On the basis of examination and/or investigation, in my opinion, death occurred due to _____ Doctor Signature: <i>[Signature]</i> M.D. Date: AUG-11-2019 Center Name: KNIGHTS MEDICAL EXAMINER (Medical Examiner, Coroner, or Chief Medical Examiner)					
11a. Usual Residence State US Virgin Islands		11b. County St. Thomas		11c. City or Town St. Thomas	
11d. State or Parish St. John		11e. ZIP Code 00802		11f. Inside City Limits? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12. Date of Birth (Month) (Day) (Year/yyyy) January 20 1953		13. Age at last birthday (years) 66		14. Social Security No. 3348	
15a. Usual Occupation (Type of work done during last 12 months) (Do not list retired) Consultant		15b. Kind of business or industry Finance		16. Abbreviation of SIC# _____	
17. Residence (City & State or Foreign Country) Brooklyn, New York		18. Education (Check the box that best describes the highest degree or level of schooling received at the time of death) 1 <input type="checkbox"/> No graduate work done 2 <input type="checkbox"/> High school graduate or GED 3 <input type="checkbox"/> Some college work, but no degree 4 <input type="checkbox"/> Bachelor's degree or B.S. 5 <input type="checkbox"/> Some graduate work, but no degree 6 <input type="checkbox"/> Master's degree or M.A., M.S. 7 <input type="checkbox"/> Doctoral degree or Ph.D., Ed.D. or equivalent degree (e.g., M.D., D.O.B., D.V.M., LL.M., J.D.) 8 <input type="checkbox"/> Postdoctoral degree (e.g., M.D., D.O.B., D.V.M., LL.M., J.D.)			
19. Ever in U.S. Armed Forces? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		20. Marital/Partnership Status at time of death 1 <input type="checkbox"/> Married <input type="checkbox"/> Domestic Partnership 2 <input type="checkbox"/> Married, but separated <input type="checkbox"/> Never Married 3 <input type="checkbox"/> Other, Specify _____		21. Spouse's Name (Last name prior to first marriage) (First, Middle, Last) _____	
22. Father's Name (First, Middle, Last) Seymour Epstein		23. Mother's Name (Last name prior to last marriage) (First, Middle, Last) Paula Slobosky			
24a. Informant's Name Mark Epstein		24b. Relationship to Decedent Brother		24c. Address (Street and Number) City & State ZIP Code) 334 11-8219	
25a. Method of Disposition 1 <input type="checkbox"/> Burial <input type="checkbox"/> Cremation <input type="checkbox"/> Entombment <input type="checkbox"/> City Cemetery 6 <input type="checkbox"/> Other Specify _____		25b. Place of Disposition (Name of cemetery, crematory, other place) _____			
26. Location of Disposition (City & State or Foreign Country)		25d. Date of Disposition 08 13 2019			
28a. Funeral Establishment		28b. Address (Street and Number) City & State ZIP Code) 1076 Madison Ave New York, NY 10028-0237			
No Correction History ***					

EVT201908377126

[Signature]
 Gretchen Van Wye, Ph.D., City Registrar as of 8/1/18

August 11, 2019

[Signature]
 Steven P. Schwartz, Ph.D., City Registrar

This is to certify that the foregoing is a true copy of a record on file in the Department of Health and Mental Hygiene. The Department of Health and Mental Hygiene does not certify to the truth of the statements made therein, as no inquiry as to the facts has been provided by law.

Do not accept this transcript unless it bears the security features listed on the back. Reproduction or alteration of this transcript is prohibited by §3-19(b) of the New York City Health Code if the purpose is the evasion or violation of any provision of the Health Code or any other law.



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VR 18 (Rev. 01/08)

EXHIBIT

2

THE CITY OF NEW YORK

VITAL RECORDS CERTIFICATE

DEATH TRANSCRIPT

DATE FILED THE CITY OF NEW YORK -- DEPARTMENT OF HEALTH AND MENTAL HYGIENE
 AUG-11-2019 07:36 PM **CERTIFICATE OF DEATH** Certificate No. 158-19-032838

SUPERIOR COURT
 THE VICE CHIEF CLERK
 19 AUG 15 PM 4:10

1. DECEDENT'S LEGAL NAME **JEFFREY EDWARD ERSTEIN**
 (First, Middle, Last)

Place of Death	2a. New York City	2c. Type of Place	4 <input type="checkbox"/> Nursing Home/Long Term Care Facility	2d. Any Hospice care in last 30 days	2e. Name of hospital or other facility (if not facility, street address)
	2b. Borough Manhattan	1 <input type="checkbox"/> Hospital Inpatient 2 <input checked="" type="checkbox"/> Emergency Dept./Outpatient 3 <input type="checkbox"/> Dead on Arrival	5 <input type="checkbox"/> Hospice Facility 6 <input type="checkbox"/> Decedent's Residence 7 <input type="checkbox"/> Other Specify _____	1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No 3 <input type="checkbox"/> Unknown	New York-Presbyterian-Lower Manhattan Hospital
Date and Time of Death or Found Dead		2a. (Month) August	(Day) 10	(Year/yyyy) 2019	2b. Time 7:36
				3. AM <input type="checkbox"/> AM	4. Sex Male
				5. OCME Case No. M19019432	
(To be filled in by the OCME)	a. Immediate cause Pending Further Study				
	b. Due to or as a consequence of				
	c. Due to or as a consequence of				
PART II Other significant conditions contributing to death but not listed in the underlying cause given in Part I. Include operation information.					
7a. Injury Date (mm dd yyyy)		7b. Time	7c. At Work	7d. Place of Injury	
***		<input type="checkbox"/> AM <input type="checkbox"/> PM	1 <input type="checkbox"/> Yes 2 <input type="checkbox"/> No	7e. Location	
7f. How Injury Occurred					
7g. If Transportation Injury Specify		8. Manner of Death		9. Autopsy	
<input type="checkbox"/> Driver/Operator <input type="checkbox"/> Pedestrian <input type="checkbox"/> Passenger <input type="checkbox"/> Other Specify _____		<input checked="" type="checkbox"/> Pending further study <input type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Undetermined		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Autopsy Performed (if Yes, specify)	
				10. On the basis of examination and/or investigation, in my opinion, death occurred due to Cause of Death: Heart Disease D.O. M.P. Date AUG-11-2019 Medical Examiner: KEVIN J. HAN (Medical Examiner, County/City) (City/State/Country)	
11a. Usual Residence State	11b. County	11c. City or Town		11d. ZIP Code	11e. Inside City Limits?
US Virgin Islands	St. Thomas	St. Thomas		00802	1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No
12. Date of Birth (Month) (Day) (Year/yyyy)		13. Age at last birthday (years)		14. Social Security No.	
January 20 1953		66		3348	
15a. Usual Occupation (Type of work done during last 12 months)		15b. Kind of business or industry		15c. Industry of SIC#	
Consultant		Finance		***	
17. Birthplace (City & State or Foreign Country)		18. Education (Check the box that best describes the highest degree or level of schooling completed at the time of death)			
Brooklyn, New York		<input type="checkbox"/> No schooling less than high school <input type="checkbox"/> Some college (less than 4-year degree) <input type="checkbox"/> Bachelor's degree (4-year degree) <input type="checkbox"/> Master's degree (less than Ph.D.) <input type="checkbox"/> Doctoral degree (Ph.D. or equivalent)			
19. Ever in U.S. Armed Forces?	20. Marital/Partnership Status at time of death		21. Serving Spouse/Partner (Last name prior to first marriage) (First, Middle, Last)		
1 <input type="checkbox"/> Yes 2 <input checked="" type="checkbox"/> No	<input type="checkbox"/> Married <input type="checkbox"/> Domestic Partnership <input type="checkbox"/> Married, but separated <input type="checkbox"/> Never Married		***		
22. Father's Name (First, Middle, Last)		23. Name of Spouse/Partner (Last name prior to first marriage) (First, Middle, Last)			
Seymour Epstein		Paula Stolofsky			
24a. Informant's Name		24b. Relationship to Decedent		24c. Address (Street and Number) City & State ZIP Code	
Mark Epstein		Brother		1076 Madison Ave New York, NY 10028-0237	
25a. Method of Disposition		25b. Place of Disposition (Name of cemetery, crematory, other place)			
1 <input type="checkbox"/> Burial 2 <input type="checkbox"/> Cremation 3 <input type="checkbox"/> Entombment 4 <input type="checkbox"/> City Cemetery		***			
25c. Location of Disposition (City & State or Foreign Country)		25d. Date of Disposition		25e. Date of Disposition	
***		mm dd yyyy 08 13 2019		mm dd yyyy 08 13 2019	
25a. Funeral Establishment		25b. Address (Street and Number) City & State ZIP Code			
***		1076 Madison Ave New York, NY 10028-0237			

EV20190837726 August 11, 2019


Gretchen Van Wye
 Gretchen Van Wye, Ph.D., City Registrar as of 8/1/18

Steven P. Schwartz
 Steven P. Schwartz, Ph.D., City Registrar

This is to certify that the foregoing is a true copy of a record on file in the Department of Health and Mental Hygiene. The Department of Health and Mental Hygiene does not certify to the truth of the statements made thereon, as no inquiry as to the facts has been provided by law.

No correction history ***

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