

FILED

April 21, 2020

TAMARA CHARLES
CLERK OF THE COURT

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

IN THE MATTER OF THE ESTATE OF)	
JEFFREY E. EPSTEIN,)	PROBATE NO. ST-19-PB-80
)	
Deceased.)	ACTION FOR TESTATE
_____)	ADMINISTRATION

STATUS REPORT FROM CLAIMANTS

My firm represents five sexual assault victims of Jeffrey Epstein in coordination with The Bloom Firm. From the recent filings of the United States Virgin Islands Attorney General, Denise George ("AG") and the Estate of Jeffrey Epstein ("Estate"), there does not appear to be any dispute at this time and the Estate's Victims Compensation Program ("Program") can and should proceed.

Specifically, the AG's most recent status report filed on April 7, 2020 made clear that the one remaining issue she has with the proposed Program is "the release it has proposed" and "whether the release must be reformed to avoid protecting independently culpable third parties who themselves raped women or children." (See AG Status Report at p. 4, Ex. A).

In response, the Estate filed its own status report on April 10 that included, as an exhibit, the proposed release that provides in part "This General Release specifically does not include _____ as Releasee or released party under this Agreement, and all parties expressly acknowledge, agree and understand that any and all claims that Releasor has or may have against _____ are expressly reserved." (See Estate Status Report at p. 14, Ex. B).

As such, the AG's single issue with the Program can be addressed by the provision cited by the Estate and the Program can and should proceed without delay.

Moreover, The Bloom Firm strongly believes that permitting the Program to proceed would be in the best interests of the victims at this time. The increased delay in funding the Program has

exacerbated the pain and suffering of our clients. We believe the immediate funding of the Program would be in the best interests and well-being of the victims. The Program would allow victims to seek compensation for their pain and anguish in a confidential setting without the added delays and stress of litigation. There is no harm or risk associated with participating in the Program, as administrators have made clear that participation is entirely voluntary and that the victims may withdraw from the Program at any time prior to execution of the Release. Permitting the Program to move forward is in the best interests of the victims.

Dated: Christiansted, St. Croix
April 21, 2020

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on April ___, 2020, I caused a true and correct copy of the foregoing
Status Report from the Claimants to be served on the following:

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