

July 20, 2020

TAMARA CHARLES

CLERK OF THE COURT

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

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS,)
Plaintiff, v.) CASE NO. ST-20-CV-014) ACTION FOR DAMAGES
DARREN K. INDYKE, in his capacity as the EXECUTOR FOR THE ESTATE OF JEFFREY E. EPSTEIN and ADMINISTRATOR OF THE 1953 TRUST; RICHARD D. KAHN, in his capacity as the EXECUTOR FOR THE ESTATE OF JEFFREY E. EPSTEIN, and ADMINISTRATOR OF THE 1953 TRUST; ESTATE OF JEFFREY E. EPSTEIN, THE 1953 TRUST, PLAN D, LLC; GREAT ST. JIM, LLC; NAUTILUS, INC.; HYPERION AIR, LLC; POPLAR, INC., SOUTHERN TRUST COMPANY, INC.; JOHN AND JANE DOES	
Defendants.)))

NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM

Plaintiff, by and through its undersigned counsel, and, pursuant to V.I.R. Civ. P. Rule 45(a)(4), hereby gives notice that it intends to serve the attached non-party subpoena duces tecum on the following:

- 1. Bank Leumi
- 2. Charles Schwab
- 3. Citibank
- 4. Fidelity Investment, Inc.
- 5. Northern Trust International Banking, Corp.
- 6. Silicon Valley Bank
- 7. Wells Fargo & Co.

NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM ON

Bank Leumi; Charles Schwab; Citibank; Fidelity Investment, Inc.; Northern Trust International Banking, Corp.; Silicon Valley Bank; and Wells Fargo & Co.

Government of the United States Virgin Islands v. Darren K. Indyke, in his Capacity as the Executor of the Estate of Jeffrev E. Epstein, et al.

Case No. ST-20-CV-014

Page 2

Respectfully submitted,

DENISE N. GEORGE, ESQ. ATTORNEY GENERAL

DATE: July <u>20</u>, 2020

CAROL THOMAS- JACOBS, ESQ.

Chief Deputy Attorney General

Virgin Islands Department of Justice Office of the Attorney General

34-38 Kronprindsens Gade

G.E.R.S. Complex, 2nd Floor St. Thomas, USVI 00802

(340) 774-5666 Ext. 359

carol.jacobs@doj.vi.gov

LINDA SINGER MOTLEY RICE LLC

401 9th Street NW, Suite 1001 Washington, DC 20004

Tel: 202-232-5504 Fax: 202-386-9622 lsinger@motleyrice.com

Attorney for Plaintiff Government of the United States Virgin Islands NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM ON

Bank Leumi; Charles Schwab; Citibank; Fidelity Investment, Inc.; Northern Trust International

Banking, Corp.; Silicon Valley Bank; and Wells Fargo & Co.

Government of the United States Virgin Islands v. Darren K. Indyke, in his Capacity as

the Executor of the Estate of Jeffrey E. Epstein, et al.

Case No. ST-20-CV-014

Page 3

CERTIFICATE OF SERVICE

It is hereby certified that on this day of July, 2020, a true and correct copy of the foregoing *Notice of Intent to Serve Subpoena Duces Tecum*, was duly served upon the following by electronic mail:

CHRISTOPHER ALLEN KROBLIN, ESQ.
ANDREW W. HEYMANN, ESQ.,
WILLIAM BLUM, ESQ.
SHARI D'ANDRADE, ESQ.
KELLERHALS FERGUSON KROBLIN PLLC
Royal Palms Professional Building
9053 Estate Thomas, Suite 101
St. Thomas, V.I. 00802-3602
Email: ckroblin@kellfer.com
aheymann@solblum.com
wblum@solblum.com
sdandrade@kellfer.com
mwhalen@kellfer.com

ANDREW TOMBACK
WHITE & CASE, LLP
1221 Avenue of the Americas
New York, New York 10020-1095
United States
Email: andrew.tomback@whitecase.com

DANIEL WEINER
MARC A. WEINSTEIN
HUGHES HUBBARD & REID, LLP
One Battery Park Plaza
New York, NY 10004-1482
United States
Email: daniel.weiner@hugheshubbard.com
marc.weinstein@hugheshubbard.com