

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

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

Deceased.

PROBATE NO. ST-19-PB-80

**ACTION FOR TESTATE
ADMINISTRATION**

19 NOV 14 AM 9:02
SUPERIOR COURT
OF THE VIRGIN ISLANDS

**EXPEDITED MOTION FOR ESTABLISHMENT OF
A VOLUNTARY CLAIMS RESOLUTION PROGRAM**

COME NOW the Co-Executors of the Estate of Jeffrey E. Epstein (the "Estate"), **DARREN K. INDYKE** and **RICHARD D. KAHN**, and move this Honorable Court for an expedited order to establish an independent and voluntary claims resolution program (the "Program") for purposes of resolving sexual abuse claims against Jeffrey E. Epstein, deceased, as more fully described *infra*. As contemplated by the Co-Executors, the Program would provide all eligible claimants an opportunity to receive compensation and voluntarily resolve their claims of sexual abuse against Mr. Epstein through a confidential, non-adversarial alternative to litigation. To be designed and implemented by independent, nationally recognized claims administration experts, with input from interested parties including claimants and their representatives, the Program would seek to timely resolve these claims through a process that is sensitive to the experiences and concerns of claimants and treats them with compassion, dignity and respect.

I. BACKGROUND

As widely reported in the news media, multiple individuals have asserted or expressed their intent to assert claims of sexual abuse by Mr. Epstein (collectively, the "Sexual Abuse Claims"). To date, twelve lawsuits involving Sexual Abuse Claims have been filed in the state and federal courts of the State of New York, where claimants assert some of the complained-of conduct occurred, and which recently amended its statute of limitations to permit such claims. These

