



January 10, 2020

VIA ECF

The Honorable Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Juliette Bryant v. Darren K. Indyke and Richard D. Kahn, in their capacities as executors of the Estate of Jeffrey Edward Epstein, 19-10479*
Jane Doe 1000 v. Darren K. Indyke and Richard D. Kahn, in their capacities as executors of the Estate of Jeffrey Edward Epstein, 19-10577
Annie Farmer v. Darren K. Indyke and Richard D. Kahn, in their capacities as executors of the Estate of Jeffrey Edward Epstein, and Ghislaine Maxwell, 19-10475
Teresa Helm v. Darren K. Indyke and Richard D. Kahn, in their capacities as executors of the Estate of Jeffrey Edward Epstein, 19-10476

Dear Judge Freeman:

Pursuant to the Court's request at the November 21, 2019, Case Management Conference, Plaintiffs and Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein, jointly submit this letter to provide the Court with an update as to the progress of discussions regarding both discovery and settlement.

The parties have thus far engaged in two productive conferences pursuant to Rule 26(f) of the Federal Rules of Civil Procedure. During those conferences, the parties agreed to exchange initial disclosures by January 23, 2020, and to exchange discovery plans one week thereafter, on January 30, 2020.

As the Court is aware, Defendants have arranged for a Victims' Compensation Program that will be available to Plaintiffs. Plaintiffs' counsel has conferred with the Program's designers and administrators, the Program's administrators provided Plaintiffs with a proposed protocol for the Program, and Plaintiffs have provided some feedback to the administrators. The motion for the Superior Court of the United States Virgin Islands to approve the establishment of the Program will be heard on February 4, 2020.

The parties request a conference with the Court on February 6 or 7, 2020, to resolve any potential disagreements as to how these matters should proceed. The parties will provide the Court with their proposed discovery plan(s) 48 hours before any such conference.



Respectfully submitted,

/s/ Joshua I. Schiller

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/s/ Bennet J. Moskowitz

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cc: Counsel of Record (via ECF)