

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1000,

Plaintiff,

v.

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

Defendants.

Case No. 1:19-cv-10577-LJL-DCF

NOTICE OF DEFENDANTS' MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all prior pleadings and proceedings in this action, Defendants will move this Court before the Hon. Lewis J. Liman, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007, at a time to be scheduled by this Court, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Plaintiff Jane Doe 1000's Complaint and claims for punitive damages with prejudice (ECF No. 1); and for such other and further relief as may be just and proper.

Dated: New York, New York
February 28, 2020

By: /s/ Bennet J. Moskowitz
Bennet J. Moskowitz
TROUTMAN SANDERS LLP
875 Third Avenue
New York, New York 10022

Attorneys for Defendants