UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK CASE NO. 19-cv-9610

JANE DOE 17,

Plaintiff,

v.

DARREN K. INDYKE AND RICHARD D. KAHN, AS JOINT PERSONAL REPRESENTATIVES OF THE ESTATE OF JEFFREY E. EPSTEIN, NINE EAST 71st STREET CORPORATION, LAUREL, INC., FINANCIAL TRUST COMPANY, INC., NES, LLC, MAPLE, INC., LSJE, LLC, HBRK ASSOCIATES, INC., NAUTILUS, INC., CYPRESS, INC. and JEGE, INC.

Defendants.	

UNOPPOSED MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Andrew S. Buzin, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Alan Goldfarb, Esq. 100 S.E. 2nd Street, Suite 4500 Miami, FL 33131 Ph: (305) 371-3111 Fax: (305) 577-8375

agoldfarb@goldfarbpa.com

Mr. Goldfarb is a member in good standing of the Florida Bar. There are no pending disciplinary proceedings against Mr. Goldfarb in any State or Federal court.

I have consulted with counsel for Defendants, Bennet Moskowitz, Esq., of Troutman Sanders LLP, who has advised that Defendants do not oppose this Motion.

Dated: New York, New York

October 24, 2019

Respectfully Submitted,

By: <u>/s/ Andrew S. Buzin</u>

Andrew S. Buzin BUZIN LAW, P.C.

111 Broadway, Suite 1204 New York, NY 10006

Tel: (646) 470-4878 Fax: (347) 736-9490 abuzin@buzinlaw.com

Attorneys for Plaintiff, Jane Doe 17

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2019, I caused true and correct copies of the foregoing Motion to Unopposed Motion To Admit Counsel *Pro Hac Vice*, Affidavit of Alan Goldfarb, Esq. in Support of Motion to Admit Counsel *Pro Hac Vice*, and Order for Admission *Pro Hac Vice* on Written Motion to be served by electronic mail on defense counsel listed below:

Bennet J. Moskowitz Troutman Sanders 875 Third Avenue New York, NY 10022 Direct: 212.704.6087

bennet.moskowitz@troutman.com

By:

ANDREW S. BUZIN abuzin@buzinlaw.com

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK CASE NO. 19-cv-9610

JANE DOE 17,

Plaintiff.

v.

DARREN K. INDYKE AND RICHARD D. KAHN, AS JOINT PERSONAL REPRESENTATIVES OF THE ESTATE OF JEFFREY E. EPSTEIN, NINE EAST 71st STREET CORPORATION, LAUREL, INC., FINANCIAL TRUST COMPANY, INC., NES, LLC, MAPLE, INC., LSJE, LLC, HBRK ASSOCIATES, INC., NAUTILUS, INC., CYPRESS, INC. and JEGE, INC.

Defendants.	

DECLARATION OF ALAN GOLDFARB, ESQ. IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

- I, Alan Goldfarb, Esq., declare under penalty of perjury as follows:
- 1. Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I hereby seek admission from this Court to practice *Pro Hac Vice* to appear as counsel for Plaintiff JANE DOE 17 in the above-captioned action.
- 2. I am in good standing of the bar of the State of Florida and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3.
- 3. I have consulted with counsel for Defendants, Bennet Moskowitz, Esq., of Troutman Sanders LLP, who has advised that Defendants do not oppose this Motion.

Dated: Lake Worth, Florida October 24, 2019

Respectfully submitted,

ALAN GOLDFARB, P.A.

/s/ Alan Goldfarb

Alan Goldfarb, Esq. FBN 146924 100 S.E. 2nd Street, Suite 4500 Miami, FL 33131

Ph: (305) 371-3111 Fax: (305) 577-8375

agoldfarb@goldfarbpa.com

Attorney for Plaintiff, Jane Doe 17

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CASE NO.	
	/

JANE DOE 17,

Plaintiff,

v.

DARREN K. INDYKE AND
RICHARD D. KAHN, AS JOINT
PERSONAL REPRESENTATIVES OF
THE ESTATE OF JEFFREY E. EPSTEIN,
NINE EAST 71st STREET CORPORATION,
LAUREL, INC., FINANCIAL TRUST COMPANY,
INC., NES, LLC, MAPLE, INC., LSJE, LLC,
HBRK ASSOCIATES, INC., NAUTILUS, INC.,
CYPRESS, INC. and JEGE, INC.

Defendants.	
	/

AFFIDAVIT

- I, ALAN GOLDFARB, hereby declare as follows:
- 1. I make this Affidavit in connection with my Motion for Admission Pro Hac Vice in the above-captioned matter as co-counsel for Plaintiff, Jane Doe 17.
 - 2. I am the owner of the law firm of Alan Goldfarb, P.A.
 - 3. I am a member in good standing of the bar of the State of Florida (Exhibit "A").
 - 4. I have never been convicted of a felony.
- 5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
- 6. There are no pending disciplinary proceedings against me in any state or Federal Court.

FURTHER AFFIANT SAYETH NAUGHT.

ALAN GOLDFARB

STATE OF FLORIDA) SS COUNTY OF MIAMI-DADE)

The foregoing instrument was acknowledged before me this 17th day of October, 2019,

by ALAN GOLDFARB, who is personally known to me,

Ana I Valdes Gomez, Notary Publi

ANA I. VALDES GOMEZ
MY COMMISSION # GG 237341
EXPIRES: November 11, 2022
Bonded Thru Notary Public Underwriters

Supreme Court of Florida Certificate of Good Standing

I JOHN A. TOMASINO, Clerk of the Supreme Court of the State of Florida, do hereby certify that

ALAN GOLDFARB

was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on October 6, 1972, is presently in good standing, and that the private and professional character of the attorney appear to be good.

WITNESS my hand and the Seal of the Supreme Court of Florida at Tallahassee, the Capital, this October 24, 2019.

Clerk of the Supreme Court of Florida.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CASE NO. 1:19-cv-09610-PAE

JANE DOE 17,

Plaintiff,

v.

DARREN K. INDYKE AND RICHARD D. KAHN, AS JOINT PERSONAL REPRESENTATIVES OF THE ESTATE OF JEFFREY E. EPSTEIN, NINE EAST 71st STREET CORPORATION, LAUREL, INC., FINANCIAL TRUST COMPANY, INC., NES, LLC, MAPLE, INC., LSJE, LLC, HBRK ASSOCIATES, INC., NAUTILUS, INC., CYPRESS, INC. and JEGE, INC.

Defendants.	
	,

[PROPOSED] ORDER GRANTING ALAN GOLDFARB ADMISSION TO APPEAR PRO HAC VICE

Upon motion, for an order permitting him to appear and practice *pro hac vice* in the within action on behalf of Plaintiff, Jane Doe 17, it is hereby

ORDERED that the Motion for Alan Goldfarb to Appear *Pro Hac Vice* be GRANTED.

	UNITED STATES DISTRICT JUDGE
Dated: October, 2019	