

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 JEJE, 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:

David C. Appleby, Esq. FBN 500089
100 S.E. 2nd Street, Suite 4500
Miami, FL 33131
Ph: (305) 371-3111
Fax: (305) 577-8375
dappleby@goldfarbpa.com
Attorney for Plaintiff, Jane Doe 17

Mr. Appleby is a member in good standing of the Florida Bar. There are no pending disciplinary proceedings against Mr. Appleby 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: /s/ Andrew S. Buzin
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 David C. Appleby, 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

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CYPRESS, INC. and JEJE, INC.

Defendants.

**DECLARATION OF DAVID C. APPLEBY, ESQ.
IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

I, David C. Appleby, 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,

DAVID C. APPLEBY, P.A.

/s/ David C. Appleby

David C. Appleby, Esq. FBN 500089

100 S.E. 2nd Street, Suite 4500

Miami, FL 33131

Ph: (305) 371-3111

Fax: (305) 577-8375

dappleby@goldfarbpa.com

Attorney for Plaintiff, Jane Doe 17

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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CYPRESS, INC. and JEGE, INC.

Defendants.

_____ /

AFFIDAVIT

I, DAVID C. APPLEBY, 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 an associate at 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.

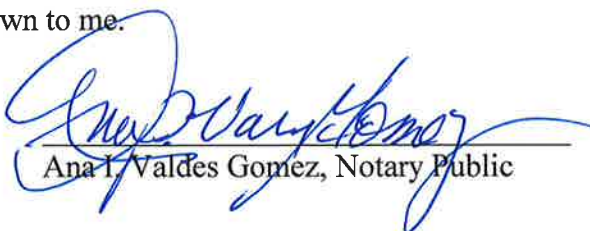
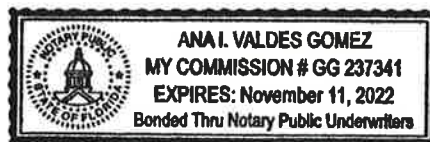
FURTHER AFFIANT SAYETH NAUGHT.



DAVID C. APPLEBY

STATE OF FLORIDA)
) SS
COUNTY OF MIAMI-DADE)

The foregoing instrument was acknowledged before me this 17th day of October, 2019,
by DAVID C. APPLEBY, who is personally known to me.


Ana I. Valdes Gomez, Notary Public

Supreme Court of Florida

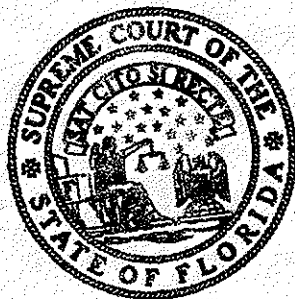
Certificate of Good Standing

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

DAVID CHARLES APPLEBY

was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on October 17, 1985, 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.*



A handwritten signature in dark ink, appearing to read "J. A. Tomasino", is written over a horizontal line.

Clerk of the Supreme Court of Florida.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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

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Defendants.

**[PROPOSED] ORDER GRANTING DAVID C. APPLEBY
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 David C. Appleby to Appear *Pro Hac Vice* be GRANTED.

UNITED STATES DISTRICT JUDGE

Dated: October _____, 2019