

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

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

Defendants.

Case No. 1:20-cv-02365-LJL-DCF

JOINT PROPOSED DISCOVERY SCHEDULE

Pursuant to the Court's Order dated July 22, 2021 (ECF No. 28) and Rule 26(f)(3) of the Federal Rule of Civil Procedure, Plaintiff Jane Doe ("Plaintiff") and Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, the "Co-Executors," and together with Plaintiff, the "Parties"), hereby jointly submit the following proposed discovery schedule:

1. If the Co-Executors move to dismiss Plaintiff's Complaint in whole or in part, Plaintiff shall have until October 6, 2021 to respond to the motion;¹
2. The Co-Executors will have until October 27, 2021 to reply;
3. The Parties shall submit their initial disclosures no later than 2 weeks after the Co-Defendants' Answer to Plaintiff's Complaint is filed;
4. Plaintiff shall provide HIPAA-compliant medical records release authorizations to Defendants no later than 14 days from the request therefor;
5. The Parties shall serve initial document requests and interrogatories no later than 30 days after the Co-Defendants' Answer to Plaintiff's Complaint is filed;

¹ Per the Court's July 22, 2021 Order (ECF No. 28), the Co-Executors were given until September 6, 2021 to move, answer, or otherwise respond to the Complaint.

6. Any motion for joinder of other parties or amendment of the pleadings shall be made no later than 45 days after the Co-Defendants' Answer to Plaintiff's Complaint is filed;
7. Fact discovery shall be completed no later than 140 days after the Co-Defendants' Answer to Plaintiff's Complaint is filed;
8. Expert disclosures and expert discovery shall be completed no later than 200 days after the Co-Defendants' Answer to Plaintiff's Complaint is filed; and
9. The Parties shall have 30 days from the service of an expert's initial report to serve a rebuttal report.

At this time, the Parties anticipate that discovery may be needed on the following subjects:

(1) Mr. Epstein's alleged torts committed against Plaintiff; and (2) Plaintiff's alleged damages.

Within 14 days from the date the Co-Defendants file their Answer to Plaintiff's Complaint, Defendants will provide Plaintiff with a standard, proposed electronically stored information ("ESI") protocol in order to address any issues about disclosure, discovery, or preservation of ESI, including the form or forms in which it should be produced.

Within 14 days from the date the Co-Defendants file their Answer to Plaintiff's Complaint, Defendants will provide Plaintiff with a proposed protective order, with standard clawback provisions, to address any issues about claims of privilege or of protection as trial-preparation materials.

At this time, the Parties have no proposed changes to the limitations on discovery imposed by the Federal Rules of Civil Procedure or by the Local Rules of the United States District Court for the Southern District of New York.

With the exception of the protective order mentioned above, the Parties are not currently aware of any other orders that the Court should issue under Rule 26(c) or under Rule 16(b) and (c).

The Parties respectfully request that the Court enter this joint proposed discovery schedule in this matter.

Dated: New York, New York
August 19, 2021

By: /s/ Brad Edwards
Brad Edwards
EDWARDS POTTINGER LLC
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301

Attorney for Plaintiff

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

Attorney for Defendants