

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TERESA HELM,

*Plaintiff,*

v.

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

*Defendants.*

Case No. 1:19-cv-10476 (PGG) (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. Paul G. Gardephe, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 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's Complaint (ECF No. 1) with prejudice for failure to state a claim and Plaintiff's claim for punitive damages; and for such other and further relief as may be just and proper.

Dated: New York, New York  
February 24, 2020

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

*Attorneys for Defendants*