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November 12, 2019

ECF

Hon. Alison J. Nathan
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *VE v. Nine East 71st Street, et al.*, 1:19-cv-07625 (AJN)

Dear Judge Nathan:

We represent Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (incorrectly named herein as "Joint Personal Representatives" of the Estate of Jeffrey E. Epstein), Nine East 71st Street, Corporation, Financial Trust Company, Inc., and NES, LLC (together, "Defendants") in the referenced action. We write to respectfully request a two week extension of Defendants' time to answer, move or otherwise respond to Plaintiff's Complaint, from November 15, 2019 to November 29, 2019. The Initial Pretrial Conference is scheduled for December 6, 2019. The requested extension would not affect any other scheduled dates in this action.

This is the first request for an extension of this deadline. The Court previously So Ordered the parties' agreement whereby we accepted service of Plaintiff's Complaint and setting the November 15 response deadline (ECF #21).

Plaintiff's counsel does not consent to this request, stating: "I cannot agree to extend your time to respond any further and cannot agree to postpone the conference." However, as explained above, this is the first request to extend the November 15 deadline; and we do not request an adjournment of the Initial Pretrial Conference.

Thank you for your attention to this matter.

Respectfully submitted,

s/Bennet J. Moskowitz
Bennet J. Moskowitz