

# Exhibit A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

**No. 19-cv-08673 (KPF)**

v.

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

Defendants.

**PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES**

Plaintiff, through her undersigned counsel, hereby makes the following initial disclosures pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure.

The following information reflects the current knowledge of Plaintiff and her counsel at this stage of the litigation and is subject to the reservation of all privileges and other immunities from discovery, including without limitation Plaintiff's right to assert any and all objections as to competency, relevancy, materiality, privilege, work product, use or admissibility as evidence. Plaintiff continues to investigate matters related to the litigation, may become aware of additional information through discovery or otherwise, may assert additional claims, and may become aware of new reasons why information presently known may be relevant to the claims in this action. Moreover, the issues raised in this matter may require analysis by retained experts. Plaintiff reserves the right to supplement, revise, and/or correct these initial disclosures as appropriate. These disclosures do not purport to identify every document, tangible thing, or witness possibly relevant to all issues that may eventually be raised in this action and are made with the full reservation of rights to supplement, amend, correct or otherwise modify these disclosures, pursuant to Federal Rule of Civil Procedure 26(e) or otherwise, if appropriate as investigation and discovery are conducted. The disclosures set forth

below are organized to correspond to the general categories set forth in Rule 26(a)(1)(A) and are made subject to the above objections and qualifications.

The following are the disclosures required by Federal Rule of Civil Procedure

26(a)(1)(A):

- 1. The name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i) and subject to the reservation of all rights and privileges described above, based on her current knowledge, information, and belief and subject to further investigation, discovery, and analysis by experts, Plaintiff discloses the following names and, if known, the address and telephone numbers of the following persons who are likely to have discoverable information that may be used to support Plaintiff's claims, along with the subjects of that information. Plaintiff reserves the right to amend or supplement this list as discovery proceeds as the identities of additional individuals who are likely to have discoverable information that Plaintiff may use to support her claims becomes known to her.

| NAME            | CONTACT INFORMATION                                                              | SUBJECTS OF INFORMATION                                                                                                            |
|-----------------|----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| Sarah Kellen    | Unknown                                                                          | The allegations in the Complaint, including that Jeffrey Epstein repeatedly sexually abused Doe in his home between 2001 and 2005. |
| Lesley Groff    | Unknown                                                                          | The allegations in the Complaint, including that Jeffrey Epstein repeatedly sexually abused Doe in his home between 2001 and 2005. |
| Dr. Dawn Hughes | c/o Kaplan Hecker & Fink, LLP<br>350 Fifth Ave, Suite 7110<br>New York, NY 10118 | Jeffrey Epstein's sexual abuse of Plaintiff, including psychological impact of that abuse.                                         |

|                                                          |                                                                                                                             |                                                                                                                                                    |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                          |                                                                                                                             | Jeffrey Epstein's sexual abuse of Plaintiff.                                                                                                       |
| Assistant U.S. Attorney<br>Alexander Rossmiller,<br>Esq. | U.S. Attorney's Office<br>Southern District of New York<br>One Saint Andrew's Plaza<br>New York, NY 10007<br>(212) 637-2415 | The allegations in the Complaint.                                                                                                                  |
| Diarmuid White, Esq.                                     | Unknown                                                                                                                     | Jeffrey Epstein's retention of Mr. White to represent Plaintiff in connection with a criminal investigation into Epstein's sexual abuse of minors. |

Further expert disclosures will be made in accordance with the Court's forthcoming scheduling order and Rule 26(b)(2). Plaintiff reserves the right to use the testimony of other witnesses whose identity may be subsequently learned through discovery or other means.

**2. A copy of, or description by category and location of, all documents, data compilations and tangible things in the possession, custody or control of the party, and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii), based on current knowledge, and subject to further investigation, discovery, and analysis by experts, Plaintiff hereby discloses the following categories of documents and things in her possession, custody or control that she may use to support her claims. Plaintiff reserves the right to amend or supplement these disclosures as provided under Fed. R. Civ. P. 26(e). The following disclosures do not include documents and things that are likely to be offered solely for impeachment:

1. Documents concerning the identity, name, date of birth, age, citizenship and/or residency of Plaintiff.
2. Documents and ESI related to the allegations in the Complaint (ECF No. 1) including, but not limited to photographs, electronic communications, and written recollections.

3. **A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iii), Plaintiff discloses that she is entitled to recover damages in the form of, *inter alia*, actual damages, compensatory damages, statutory damages, consequential damages, punitive damages, attorneys' fees, costs, and interest. Plaintiff anticipates that damages calculations will depend upon expert analyses and testimony to be developed and disclosed according to the schedule set by the Federal Rules of Civil Procedure and the Court. Plaintiff reserves the right to supplement this list with any damages as she continues to investigate the claims in this action. Subject to the foregoing, Plaintiff has certain financial and employment records that may be relevant to damages calculations.

4. **Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in the action to indemnify or reimburse for payments made to satisfy the judgment.**

Not applicable.

Respectfully submitted,



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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 5, 2020, I provided copies of the foregoing via email to the following:

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