



April 30, 2020

VIA ECF

The Honorable Debra C. Freeman
District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Annie Farmer v. Darren K. Indyke, et al.*,
Case No. 19-cv-10475-LGS-DCF

Dear Judge Freeman,

I represent Plaintiff Annie Farmer in the above-referenced action against Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, the "Co-Executors") and Ghislaine Maxwell (together with the Co-Executors, "Defendants," and Defendants together with Plaintiff, the "Parties"). In light of the ongoing pandemic and the various difficulties it has presented for all parties, I write with the consent of Defendants to request that the Court extend the remaining deadlines in the above-referenced action, as set by this Court's Order dated February 11, 2020, by thirty (30) days, as follows:

- the deadline for Plaintiff to file any motion to amend the pleadings or to join any additional parties be extended from April 30, 2020 to June 1, 2020;
- the deadline for the Parties to submit joint status reports to the Court, regarding discovery and the progress of settlement discussions, be extended from April 30, 2020 to June 1, 2020;
- the deadline for the completion of fact discovery be extended from June 10, 2020 to July 10, 2020;
- the deadline for service of Plaintiff's expert reports be extended from June 10, 2020 to July 10, 2020;
- the deadline for service of the Defendants' rebuttal reports be extended from July 10, 2020 to August 10, 2020; and
- the deadline for the completion of expert discovery be extended from July 31, 2020 to August 31, 2020.

Maxwell's position is as follows:

"Ms. Maxwell has no objection to the 30 day extension proposed by the other parties. However, counsel for Ms. Maxwell submits that more than thirty (30) additional days will be necessary to complete discovery in this case. Ms. Maxwell is filing a Motion to Dismiss the claims against her on May 14, 2020 and intends to file a Motion to Stay Discovery for that and other reasons. Plaintiff has indicated a desire to schedule ten depositions and has disclosed a number of other witnesses which will require a number of depositions to be taken by the Defendants. Given the current shelter-in-place orders in New York and across the country, the associated travel difficulties, and scheduling complications for the witnesses and counsel, it is highly unlikely that such depositions can be completed by July 10, 2020."

Plaintiff does not consent to more than a thirty-day extension of deadlines at this time, as the Parties can work to meet the proposed July 10 fact discovery deadline. If more time is necessary to complete depositions, the Parties may request another extension of deadlines in the beginning of July, which request could describe what discovery remains to be completed as of the date of that request.

This is the first request for an extension of these deadlines.

Sincerely,

/s/ Sigrid McCawley

Sigrid S. McCawley, Esq.

cc: Counsel of Record (via ECF)
