

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANNIE FARMER,

Plaintiff,

v.

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

Defendants.

Case No. 1:19-cv-10475-LGS-DCF

[PROPOSED] ORDER STAYING ACTION

WHEREAS independent claims administration experts have designed and are implementing the Epstein Victims' Compensation Program (the "Program") to resolve sexual abuse claims against decedent Jeffrey E. Epstein ("Decedent") in a non-adversarial alternative to litigation; and

WHEREAS Plaintiff Annie Farmer ("Plaintiff," and together with Defendants, Darren K. Indyke and Richard D. Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein, the "Participating Parties"), seeks to participate in the Program; and

WHEREAS the Participating Parties and Defendant Ghislaine Maxwell ("Maxwell") seek to preserve their resources and judicial economy by staying this action for sixty (60) days while Plaintiff participates in the Program; and

WHEREAS should Plaintiff resolve her claims against Decedent and Maxwell via the Program, Plaintiff will promptly discontinue this action with prejudice.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Participating Parties and Maxwell, that:

1. The captioned action is hereby stayed, both as to discovery and to the resolution of any pending motions, for sixty (60) days from the date of entry of this Order.
2. After expiration of the stay, if any, the parties will confer on a schedule for the remaining discovery in this action and a briefing schedule on Maxwell's Motion to Dismiss or to Transfer (ECF No. 75).

SO ORDERED:

Date: _____, 2020
New York, New York

HON. DEBRA C. FREEMAN
United States Magistrate Judge