

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

JOINT STIPULATION AND [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") and any employee or party related to Decedent in a non-adversarial alternative to litigation; and

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

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

WHEREAS Plaintiff and her Counsel stipulate that successful participation in the Program will resolve all claims against Decedent and Defendant Ghislaine Maxwell ("Maxwell");

WHEREAS successful participation in the Program means that Plaintiff will sign a release that includes Maxwell and will promptly dismiss this action with prejudice prior to the receipt of any compensation from the Program;

WHEREAS Maxwell contests that Plaintiff is entitled to receive any compensation from the Program based on her claims against Maxwell;

WHEREAS Maxwell reserves all rights to seek indemnification for her legal fees and costs from Decedent's Estate incurred during the course of defending this lawsuit, regardless of whether Plaintiff voluntarily dismisses this action;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, 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 the stay, if any, Plaintiff will be entitled to one additional week to submit her opposition to Maxwell's Motion to Dismiss or Transfer (ECF No. 75) and the Parties will confer on a schedule for the remaining discovery in this action, if any.

Dated: June 11, 2020
New York, New York

Respectfully submitted,
BOIES, SCHILLER & FLEXNER LLP

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Attorneys for Defendant Ghislaine Maxwell

Date: _____, 2020
New York, New York

HON. DEBRA C. FREEMAN
United States Magistrate Judge