



December 1, 2020

VIA ECF

The Honorable Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Annie Farmer v. Darren K. Indyke and Richard D. Kahn, in their capacities as executors of the Estate of Jeffrey Edward Epstein, and Ghislaine Maxwell,*
19-CV-10475-LGS-DCF

Dear Judge Freeman:

Pursuant to the Court's September 4, 2020, order (ECF No. 93) Plaintiff and Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein, and Ghislaine Maxwell, jointly submit this status report. Plaintiff submitted her claim to the Epstein Victims' Compensation Program on June 26, 2020, and accepted an offer of compensation on October 5, 2020. Plaintiff and the Estate stipulated to a dismissal of this action with prejudice pursuant to Rule 41(a)(1)(A)(ii) with each party to bear its own fees and costs. Defendant Maxwell did not agree to a stipulated dismissal unless she is provided with a release by Plaintiff and is assured by defendant Estate that any dismissal is without prejudice to her current indemnification lawsuit against the Estate. Accordingly, Plaintiff filed a letter on November 17, 2020, requesting a pre-motion conference on her request to dismiss this action with prejudice pursuant to Rule 41(a)(2). ECF No. 97. Defendant Maxwell filed a response on November 23, 2020. ECF No. 99. Today, the Court ordered the parties to continue to meet and confer and to provide the Court with a joint submission on December 8, 2020. ECF No. 101.

Respectfully submitted,

/s/ Sigrid S. McCawley

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/s/ Bennet J. Moskowitz

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cc: Counsel of Record (via ECF)