

Exhibit D

From: [Laura Menninger](#)
To: [Andrew Villacastin](#); [Moskowitz, Bennet J.](#)
Cc: [Sabina Mariella](#); [Sigrid McCawley](#); [Josh Schiller](#); [Aaronson, Matthew J.](#); [Sirota, Valerie](#); [Glover, Charles L.](#); [DiRago, Molly](#); [Jeff Pagliuca](#)
Subject: RE: Annie Farmer v. Indyke, et al.
Date: Tuesday, November 10, 2020 3:29:09 PM

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Andrew –

Thank you for sharing that representation.

In order to make an informed decision as to whether to agree to the stipulation and to potentially forego requests for our client's fees and costs in defending against this action, we need an executed copy of the actual release.

-Laura

Laura A. Menninger | Partner
Haddon, Morgan & Foreman, P.C.
150 E. 10th Avenue | Denver, CO 80203
+1 303 831 7364 (Office)
lmenninger@hmflaw.com

From: Andrew Villacastin <avillacastin@bsflp.com>
Sent: Tuesday, November 10, 2020 10:29 AM
To: Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>
Cc: Laura Menninger <lmenninger@hmflaw.com>; Sabina Mariella <smariella@bsflp.com>; Sigrid McCawley <smccawley@bsflp.com>; Josh Schiller <jischiller@bsflp.com>; Aaronson, Matthew J. <Matthew.Aaronson@troutman.com>; Sirota, Valerie <Valerie.Sirota@troutman.com>; Glover, Charles L. <Charles.Glover@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>
Subject: RE: Annie Farmer v. Indyke, et al.

Bennet and Laura,

Thank you for speaking this morning.

Laura,

The objection you raised on the call was whether your client's name was included within the section that reads: "This General Release specifically does not include _____ as a Releasee or released party under this Agreement , and all parties expressly acknowledge, agree and understand that any and all claims that Releasor has or may have against _____ are expressly preserved."

Without waiving the confidentiality of the remainder of the document, and in order to avoid unnecessary motion practice and expense, Plaintiff is willing to disclose that your client's name is not written into that section.

With that understanding, please let us know if you are willing to sign the attached stipulation, or if Plaintiff should proceed as we had discussed on the call.

Best,
Andrew

Andrew Villacastin
Associate

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55 Hudson Yards
New York, NY 10001
(t) +1 212 909 7628
avillacastin@bsfllp.com
www.bsfllp.com

From: Moskowitz, Bennet J. [<mailto:Bennet.Moskowitz@troutman.com>]
Sent: Friday, November 6, 2020 2:27 PM
To: Andrew Villacastin <avillacastin@bsfllp.com>
Cc: Laura Menninger <lmenninger@hmflaw.com>; Sabina Mariella <smariella@bsfllp.com>; Sigrid McCawley <smccawley@bsfllp.com>; Josh Schiller <jischiller@bsfllp.com>; Aaronson, Matthew J. <Matthew.Aaronson@troutman.com>; Sirota, Valerie <Valerie.Sirota@troutman.com>; Glover, Charles L. <Charles.Glover@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>
Subject: Re: Annie Farmer v. Indyke, et al.

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11am fine here. Thanks

Bennet J. Moskowitz*
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On Nov 6, 2020, at 2:25 PM, Andrew Villacastin <avillacastin@bsfllp.com> wrote:

EXTERNAL SENDER

We're available Tuesday from 11 to 11:30 and after 4pm Eastern.

Bennet, can you make 11am? If not, how about 4pm?

Best,
Andrew

Andrew Villacastin
Associate

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55 Hudson Yards
New York, NY 10001
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From: Laura Menninger [<mailto:lmessenger@hmflaw.com>]
Sent: Friday, November 6, 2020 11:46 AM
To: 'Moskowitz, Bennet J.' <Bennet.Moskowitz@troutman.com>; Andrew Villacastin <avillacastin@bsfllp.com>; Sabina Mariella <smariella@bsfllp.com>
Cc: Sigrid McCawley <smccawley@bsfllp.com>; Josh Schiller <jischiller@bsfllp.com>; Aaronson, Matthew J. <Matthew.Aaronson@troutman.com>; Sirota, Valerie <Valerie.Sirota@troutman.com>; Glover, Charles L. <Charles.Glover@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>
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I'm not available on Monday. I'm available Tuesday except for 11:30-12:30 ET.

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From: Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>
Sent: Friday, November 6, 2020 9:36 AM
To: Andrew Villacastin <avillacastin@bsflfp.com>; Sabina Mariella <smariella@bsflfp.com>; Laura Menninger <lmenninger@hmflaw.com>
Cc: Sigrid McCawley <smccawley@bsflfp.com>; Josh Schiller <jischiller@bsflfp.com>; Aaronson, Matthew J. <Matthew.Aaronson@troutman.com>; Sirota, Valerie <Valerie.Sirota@troutman.com>; Glover, Charles L. <Charles.Glover@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>
Subject: RE: Annie Farmer v. Indyke, et al.

I am available on Monday from 930am – 2pm Eastern. Thank you.

Bennet J. Moskowitz*

Partner

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From: Andrew Villacastin <avillacastin@bsflfp.com>
Sent: Friday, November 6, 2020 11:06 AM
To: Sabina Mariella <smariella@bsflfp.com>; Laura Menninger <lmenninger@hmflaw.com>
Cc: Sigrid McCawley <smccawley@bsflfp.com>; Josh Schiller <jischiller@bsflfp.com>; Aaronson, Matthew J. <Matthew.Aaronson@troutman.com>; Sirota, Valerie <Valerie.Sirota@troutman.com>; Glover, Charles L. <Charles.Glover@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>
Subject: RE: Annie Farmer v. Indyke, et al.

EXTERNAL SENDER

Bennet and Laura,

Please let us know your availability to meet and confer early next week on the proposed stipulated dismissal, which is reattached for your convenience. If for some reason we cannot agree to a stipulation, Plaintiff intends file a motion for dismissal under Rule 41. We are available all day Monday. Please let us know what times work for you both.

Best,
Andrew

Andrew Villacastin

Associate

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From: Sabina Mariella
Sent: Friday, October 30, 2020 10:15 PM
To: Laura Menninger <lmenninger@hmflaw.com>
Cc: Sigrid McCawley <smccawley@bsflfp.com>; Josh Schiller <jischiller@bsflfp.com>; Andrew Villacastin <avillacastin@bsflfp.com>; Aaronson, Matthew J. <Matthew.Aaronson@troutman.com>; Sirota, Valerie <Valerie.Sirota@troutman.com>; Glover, Charles L. <Charles.Glover@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>
Subject: RE: Annie Farmer v. Indyke, et al.

Laura,

Bennet sent you a copy of the release on June 19, 2020 at 5:41 pm EST. That is the same version that Ms. Farmer signed. And as my October 14 email stated, Ms. Farmer has received and accepted an offer of compensation. I am not sure what further details you need in order to agree to a voluntary dismissal, but as I have said before, Ms. Farmer is entitled to confidentiality as to her participation in this Program and is not waiving that confidentiality in exchange for your agreement to dismiss this case.

Sabina

From: Laura Menninger [<mailto:lmenninger@hmflaw.com>]
Sent: Monday, October 26, 2020 3:40 PM
To: Sabina Mariella <smariella@bsflfp.com>
Cc: Sigrid McCawley <smccawley@bsflfp.com>; Josh Schiller <jischiller@bsflfp.com>; Andrew Villacastin <avillacastin@bsflfp.com>; Aaronson, Matthew J. <Matthew.Aaronson@troutman.com>; Sirota, Valerie <Valerie.Sirota@troutman.com>; Glover, Charles L. <Charles.Glover@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>
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Sabina -

We have not yet received a copy of any release that your client signed in connection with her request to dismiss this case.

We also are unaware of any consideration that has been paid to your client in exchange for her dismissal.

I think before we can respond to the request for voluntary dismissal with each side to pay their own fees and costs, we need to evaluate the scope of the settlement agreement.

Thanks,
Laura

On Oct 26, 2020, at 4:06 AM, Sabina Mariella <smariella@bsfillp.com> wrote:

Laura,

We have not yet received your signature on the stipulation for dismissal. Please return the stipulation to us at your earliest convenience.

Sabina

From: Moskowitz, Bennet J. [<mailto:Bennet.Moskowitz@troutman.com>]
Sent: Wednesday, October 14, 2020 9:00 PM
To: Sabina Mariella <smariella@bsfillp.com>
Cc: Sigrid McCawley <smccawley@bsfillp.com>; Josh Schiller <jjschiller@bsfillp.com>; Andrew Villacastin <avillacastin@bsfillp.com>; Aaronson, Matthew J. <Matthew.Aaronson@troutman.com>; Sirota, Valerie <Valerie.Sirota@troutman.com>; Glover, Charles L. <Charles.Glover@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Laura Menninger <lmenninger@hmflaw.com>
Subject: RE: Annie Farmer v. Indyke, et al.

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Hello Sabina:

Thank you for letting us know. We signed the attached copy of the stipulation.

Best,
Bennet

Bennet J. Moskowitz*

Partner

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From: Sabina Mariella <smariella@bsfllp.com>

Sent: Wednesday, October 14, 2020 12:27 PM

To: Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Laura Menninger <lmenninger@hmflaw.com>

Cc: Sigrid McCawley <smccawley@bsfllp.com>; Josh Schiller <jischiller@bsfllp.com>; Andrew Villacastin <avillacastin@bsfllp.com>; Aaronson, Matthew J. <Matthew.Aaronson@troutman.com>; Sirota, Valerie <Valerie.Sirota@troutman.com>; Glover, Charles L. <Charles.Glover@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>

Subject: Annie Farmer v. Indyke, et al.

EXTERNAL SENDER

Bennet and Laura,

We write to inform you that Annie Farmer has accepted an offer of compensation from the Epstein Victims' Compensation Program. Attached is a draft joint stipulation of dismissal. Please let me know if we can add your e-signatures and file.

Thanks,

Sabina Mariella

Associate

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<Annie Farmer Stipulation of Dismissal.docx>