

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 43,

Plaintiff,

vs.

JEFFREY EPSTEIN, GHISLAINE
MAXWELL, SARAH KELLEN, LESLEY
GROFF, AND NATALYA MALYSHEV

Defendants.

Civil Action No. 17 Civ. 616 (JGK)

**STIPULATION AND
[PROPOSED] ORDER**

Plaintiff, Doe 43, and Defendants, Jeffrey Epstein (“Epstein”), Lesley Groff (“Groff”), and Sarah Kellen (“Kellen”) (collectively, “Defendants”), through their respective undersigned counsel, stipulate to the following schedule:

1. May 15, 2017 – Defendants serve letters on Plaintiff setting forth their view on the insufficiency of the complaint;
2. June 5, 2017 – Plaintiff files an amended complaint or stands on her complaint;
3. If Plaintiff stands on her complaint:
 - a. June 19, 2017 – Defendants move to dismiss;
 - b. July 19, 2017 – Plaintiff responds to motion to dismiss; and
 - c. August 2, 2017 – Defendants reply to Plaintiff’s response.
4. If Plaintiff files an amended complaint:
 - a. June 26, 2017 – Defendants move to dismiss;
 - b. July 26, 2017 – Plaintiff response to motion to dismiss; and
 - c. August 9, 2017 – Defendants reply to Plaintiff’s response.

RESPECTFULLY SUBMITTED,

Dated: May 12, 2017

FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.

By: Brad Edwards / PP
Brad Edwards

BOIES, SCHILLER & FLEXNER LLP

By: Sigrid S. McCawley / PP
Sigrid S. McCawley

Attorneys for Plaintiff Jane Doe 43

Dated: May 12, 2017

STEPTOE & JOHNSON, LLP

By: Michael C. Miller / PP
Michael C. Miller
Justin Y.K. Chu

*Attorneys for Defendants
JEFFREY EPSTEIN & LESLEY GROFF*

Dated: May 12, 2017

ALSTON & BIRD, LLP

By: Alexander S. Lorenzo / PP
Alexander S Lorenzo
John E. Stephenson, Jr.
(Application for admission
pro hac vice pending)

Attorneys for Defendant Sarah Kellen

SO ORDERED:

U.S.D.J.