

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

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DATE FILED: 5-15-17

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:

Mr. G. Keller  
U.S.D.J.

5/15/17