

Michael C. Miller
212 506 3955
mmiller@steptoe.com



1114 Avenue of the Americas
New York, NY 10036
212 506 3900 main
www.steptoel.com

May 18, 2017

VIA ECF

Hon. John G. Koeltl
United States District Court
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: Jane Doe 43 v. Jeffrey Epstein, et al.
Civil Action No. 17-cv-616**

Dear Judge Koeltl:

We are counsel to Defendants Jeffrey Epstein ("Epstein") and Lesley Groff ("Groff") in the above-referenced matter. We write to request that the conference with the Court currently scheduled for June 2, 2017 be adjourned for the reasons set forth below. We have been advised by counsel for Defendant Sarah Kellen that she joins in this application.

By way of background, on May 15, 2017, Defendants Epstein and Groff served a letter on counsel for the Plaintiff identifying the many fundamental bases which exist for dismissing the Plaintiff's Complaint. On the same day, Defendant Sarah Kellen served a letter on counsel for the Plaintiff identifying additional grounds for dismissing the Complaint. These letters were served pursuant to the schedule set forth in the Court's May 15, 2017 Stipulation and Order ("Scheduling Order").

After receiving these letters, counsel for Plaintiff advised the undersigned that Plaintiff is likely to amend her Complaint, instead of standing on the Complaint. Pursuant to the Scheduling Order, Plaintiff will have until June 5, 2017 to file an amended complaint. Defendants will have until June 19, 2017 to move to dismiss the amended complaint, and briefing on the motions to dismiss will be completed by August 2, 2017.

In light of the Court's issuance of the Scheduling Order and Plaintiff's obligation to serve an amended complaint on or before June 5, 2017, we respectfully request that the conference

Hon. John G. Koeltl
May 18, 2017
Page 2



scheduled for June 2, 2017 be adjourned until after Plaintiff has served her amended complaint and preferably until briefing on the motions to dismiss has been completed. We respectfully believe that adjourning the conference until such time would make practical sense.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Miller Miller / ML".

Michael C. Miller
Counsel for Defendants
Jeffrey Epstein and Lesley Groff