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May 19, 2017

Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *Jane Doe 43 v. Jeffrey Epstein, Ghislaine Maxwell, et. Al*
Case No. No. 17 Civ. 00616 (JGK)

Dear Judge Koeltl:

We are counsel for Jane Doe 43 in the above referenced matter and we write in response to the letter submitted by Defendants on May 18, 2017 requesting an adjournment of the June 2, 2017 hearing. Defendants ignored your individual practice rules and failed to set forth Plaintiff's position that she objects to any further delay of this hearing.

From the initial Rule 26(f) conferral, Plaintiff and Defendants have had one fundamental disagreement in need of immediate resolution. Plaintiff desires to exchange Rule 26 disclosures immediately and begin discovery, while Defendant refuses to do so and insists on doing nothing until the Motion to Dismiss is fully briefed and the Court rules on it. Plaintiff recently communicated with Defendants' counsel on May 16, 2017, her desire to proceed with the scheduled hearing and raise with the Court that both parties should be required to submit their Rule 26 disclosures without further delay and proceed with discovery.

Defendants are taking the position that the hearing should be adjourned and Defendants should not be required to exchange their Rule 26 disclosures or otherwise participate in discovery until the Court has resolved the Motion to Dismiss, which according to the briefing schedule will delay even basic disclosures in this case for months. Defendants cannot unilaterally decide against

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exchanging Rule 26 disclosures and effectively grant themselves a stay by seeking to adjourn the June 2, 2017 hearing; however, that is exactly what they have done.

Plaintiff respectfully requests that the Court proceed with the June 2, 2017 hearing at which time Defendants' efforts at delay can be properly addressed.

Very Truly Yours,

FARMER, JAFFE, WEISSING, EDWARDS, FISTOS and LEHRMAN, PL

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BJE:mwk