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October 5, 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 the plaintiff in this action, Jane Doe 43. We write to request that the Court continue to plan to hold in the near future a status conference in this matter, although we have no objection to rescheduling the currently-set October 10, 2017, conference to a date that is convenient for defense counsel.

As the Court is aware, on July 17, 2017, the Court entered an order allowing the defendants to seek release of certain documents from Judge Sweet after the Defendants claimed the materials were necessary for an argument they intended to make in their motion to dismiss to support a claim against jurisdiction and statute of limitations. While the Court appears to have envisioned that the defendants would make that request rapidly, the defendants in fact engaged in protracted negotiations before actually making the request. Plaintiff, Jane Doe 43, simply asked for an inventory of the items Defendants wanted for their stated reason of contesting jurisdiction and statute of limitations at this dismissal stage. It took months for Defendant to provide that inventory and Plaintiffs went through each document consenting to those which could even potentially bear on the two issues for which the Defendant claims to need them. The defendants only filed their request with Judge Sweet on October 4, and has asked for all documents related to Jane Doe 43, most of which have no relation to the current issues. We continue to believe that Defendants are really motivated to delay this action.

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We believe a short status conference would be useful to move this case forward. In particular, at the status conference, given that the Court is allowing Defendants to obtain documents and testimony outside the four corners of the complaint at this stage, we would intend to raise the issue of being allowed a short (one hour) deposition of defendant Epstein, which would shed light on the alleged "jurisdictional" defects in this case. We believe that, just as the defendants are gathering factual information in support of their case (alleged to be contained in Judge Sweet's docket), Jane Doe 43 should be permitted to collect information in support of her case. We believe that a short deposition of Epstein would prove, beyond any doubt, that jurisdiction is proper before the Court and, more broadly, that Jane Doe 43's claims are entirely meritorious.

In any event, we believe that a short status conference discussing such issues might be productive in moving this case forward. And, accordingly, we ask that the Court hold such a conference at a time that is convenient for the court and counsel in the near future.

Very Truly Yours,

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

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