

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

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JANE DOE 43,

17-cv-00616-JGK

Plaintiff,

vs.

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

Defendant.

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DECLARATION OF JOHN E. STEPHENSON, JR.

I, John E. Stephenson, Jr., declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney-at-law duly admitted to practice pro hac vice before the Southern District of New York in this matter. I am a partner with the law firm of Alston & Bird LLP, which has an office at 90 Park Avenue, New York, NY 10016. I represent Sarah Kellen in the above-captioned case.

2. I submit this Declaration based upon my personal knowledge, information, and belief, in support of Sarah Kellen's Motion to Dismiss the Amended Complaint.

3. Attached hereto as Exhibit A is a true and correct copy of the May 15, 2017 pre-motion letter that I sent to Plaintiff's counsel. That letter served to identify and discuss the deficiencies in the January 26, 2017 Complaint.

4. Attached hereto as Exhibit B is a true and correct copy of the April 10, 2009 *New York Times* article titled "Keeping Up With Being Kept." The article can be accessed online at <http://www.nytimes.com/2009/04/12/magazine/12sugardaddies-t.html>. The last

time that I accessed the article online was earlier today.

I declare under penalty of perjury that the above facts are true and correct.

Executed this 21st day of November, 2017.

/s/ John E. Stephenson, Jr.
John E. Stephenson, Jr.