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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Case No. 1:20-cv-00484

**NOTICE OF PLAINTIFF'S MOTION  
FOR LEAVE TO PROCEED UNDER  
PSEUDONYM**

JANE DOE,  
Plaintiff,  
v.  
DARREN K. INDYKE and RICHARD D.  
KAHN, in their capacities as executors of the  
ESTATE OF JEFFREY E. EPSTEIN,  
GHISLAINE MAXWELL, an individual,  
Defendants.

Plaintiff Jane Doe, through her attorneys of record, move this Court for an order allowing her to proceed in the above-captioned matter using pseudonyms. Plaintiff makes this request in order to protect herself from harassment, retaliation and injury. In support, Plaintiff files herewith the Plaintiff's Memorandum in Support of her Motion to Proceed by Pseudonym.

Respectfully submitted,



Kevin Boyle (admission pending)  
Robert Glassman (admission pending)  
Nathan Werksman (admission pending)

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/s/ Benedict P. Morelli

Benedict P. Morelli  
David T. Sirotkin  
Sara A. Mahoney

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