

FILED

August 05, 2022 03:58 PM

ST-2020-CV-00155

TAMARA CHARLES
CLERK OF THE COURT

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

CIVIL CASE NO.: ST-2020-CV-00155

GHISLAINE MAXWELL,

Plaintiff,

vs.

ESTATE OF JEFFREY E. EPSTEIN, DARREN
K. INDYKE, in his capacity as EXECUTOR OF
THE ESTATE OF JEFFREY E. EPSTEIN,
RICHARD D. KAHN, in his capacity as
EXECUTOR OF THE ESTATE OF JEFFREY E.
EPSTEIN, and NES, LLC, a New York Limited
Liability Company,

Defendants.

JOINT NOTICE TO COURT PURSUANT TO ORDER DATED AUGUST 2, 2022

Plaintiff GHISLAINE MAXWELL (“Plaintiff”), Defendants ESTATE OF JEFFREY E.
EPSTEIN, DARREN K. INDYKE, in his capacity as Executor of The Estate of Jeffrey E. Epstein,
RICHARD D. KAHN, in his capacity as Executor of The Estate of Jeffrey E. Epstein, and NES,
LLC, a New York Limited Liability Company (collectively, “Defendants”), and Proposed
Intervenor GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS (“GVI”), through
their respective undersigned attorneys, pursuant to this Court’s Order dated August 2, 2022, advise
as follows:

1. Defendants request oral argument on the motion to dismiss. Plaintiff does not waive,
and expressly reserves, the right to present oral argument in connection with the motion to dismiss
should the Court choose to hear the same.

2. Plaintiff and Defendants request oral argument on the motion to intervene. The GVI does not waive, and expressly reserves, the right to present oral argument in connection with the motion to intervene should the Court choose to hear the same.

3. The GVI objects to any request by Defendants to file a response in opposition to the motion to intervene.

4. Plaintiff does not object to any request by Defendants to file a response in opposition to the motion to intervene.

Dated: August 5, 2022

Respectfully submitted:

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VIRGIN ISLANDS DEPARTMENT OF JUSTICE
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