

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED	)	Case Number: 1:22-cv-10904-JSR
STATES VIRGIN ISLANDS	)	
	)	
PLAINTIFF,	)	
	)	
V.	)	
	)	
JPMORGAN CHASE BANK, N.A.	)	
	)	
DEFENDANT.	)	

MOTION FOR ISSUANCE OF LETTER OF REQUEST (LETTER ROGATORY)

NOW COMES, the Plaintiff, in the above referenced action, and moves for the Issuance of a Letter of Request (Letter Rogatory) pursuant to F.R.C.P. 28 requesting an order requiring Cathy Alexander, located at 7 Harmonie Crescent, Paradise Beach, Jeffreys Bay 6330, South Africa, to do the following:

- (a) Appear to have her remote deposition taken on a date to be agreed within 30 days of service of the subpoena at a mutually convenient location in or near Jeffreys Bay; and
- (b) Produce all Documents, Communications, and agreements related to her employment by Jeffrey Epstein, including:
 - 1. Employment and severance agreements,
 - 2. Non-disclosure agreements,
 - 3. All payments, in any form, received from or on behalf of Jeffrey Epstein, and
 - 4. All Communications with Jeffrey Epstein, Ghislaine Maxwell, Bella Klein, Daphne Wallace, Harry Beller, Lesley Groff, Sarah Kellen a/ka Sarah Kensington a/k/a Sarah Vickers, Erika Kellerhals, Richard D. Kahn, and/or Darren K. Indyke.

As grounds for this Motion, the Plaintiff states the following:

1. The above captioned case is currently pending in the United States District Court for the Southern District of New York.
2. Plaintiff alleges decedent Jeffrey E. Epstein (“Epstein”) engaged in a criminal sexual trafficking enterprise in the United States Virgin Islands, wherein he used his vast wealth and property holdings and a deliberately opaque web of corporations and companies to transport young women and girls to his privately owned islands where they were held captive and subject to severe and extensive sexual abuse. Plaintiff further alleges that Defendant JPMorgan Chase Bank, N.A. and its affiliates had actual or constructive knowledge of Epstein’s misconduct but nevertheless violated their statutory duties to report suspicious transactions from accounts held by them.
3. Upon information and belief, Cathy Alexander was employed by decedent Epstein as the house manager for his residence on Little St. James from approximately 1999 to 2007, and, as such, would have first-hand knowledge of Epstein’s conduct and visitors at Little St. James.
4. In order to prepare the case for trial, Plaintiff needs to take the deposition of Cathy Alexander.

WHEREFORE Plaintiff respectfully requests that this Honorable Court allow this Motion and issue a Letter of Request (Letter Rogatory). A proposed Letter of Request (Letter Rogatory) is attached to this Motion as Exhibit 1.

Dated: January 20, 2023

CAROL THOMAS-JACOBS, ESQ.
ACTING ATTORNEY GENERAL

/s/Linda Singer
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CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2023, the foregoing Plaintiff's Motion for Issuance of Letter of Request (Letter Rogatory) was filed with the Clerk's Office using the CM/ECF system. Notice of this filing will be sent to all parties of record by operation of, and parties may access this filing through, the Court's CM/ECF system.

/s/Linda Singer
Linda Singer