

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

JEAN BELLEVUE,)	CIVIL NO. 676/2012
)	
Plaintiff,)	
)	
vs.)	ACTION FOR NEGLIGENCE
)	AND DAMAGES
ISLAND GROUNDS, INC., and)	
JEFFREY EPSTEIN)	
)	
Defendants.)	
ISLAND GROUNDS, INC.,)	
)	CIVIL NO. 676/2012
Third Party Plaintiff,)	
vs.)	
)	
PHILLIP MARK)	
)	
Third Party Defendant.)	

AFFIDAVIT OF DARREN INDYKE

IN THE STATE OF NEW YORK)

COUNTY OF NEW YORK)

I, DARREN INDYKE, being duly sworn, do depose and state as follows:

1. I am an adult resident of Livingston, New Jersey and duly competent to swear the contents of this affidavit.
2. I am the President of Island Grounds, Inc. and completely knowledgeable concerning the matters set forth herein.
3. Island Grounds, Inc. is a representative of L.S.J., LLC, and an intended beneficiary of the Agreements dated September 20, 2010 attached to the Third Party Complaint/Counterclaim.
4. During all times relevant herein, Island Grounds, Inc. dealt with Phillip Mark as the sole proprietor of Phillip Mark, the contractor who performed work on St. James Island during the period of time in question. At no time has it ever been

represented by Phillip Mark that he is or was incorporated.

Bellevue vs. Island Grounds Inc., & Phillip Mark
Affidavit of Darren Indyke
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FURTHER AFFIANT SAYETH NAUGHT.

WITNESS

Bella Klein

ISLANDS GROUNDS, INC.,

Darren Indyke
DARREN INDYKE, PRESIDENT

SUBSCRIBED AND SWORN to before me
this 18th day of March, 2013

Harry I. Beller
Notary Public [SEAL]

HARRY I. BELLER
Notary Public, State of New York
No. 019E4653924
Qualified in Rockland County
Commission Expires Feb. 17, 2014