

DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. THOMAS AND ST. JOHN

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J.P. MOLYNEUX STUDIO, LTD. and)	CIVIL NO.	/2010
JUAN PABLO MOLYNEUX,)		
)		
Plaintiffs,)	BREACH OF CONTRACT	
)		
v.)		
)		
JEFFREY EPSTEIN,)	JURY TRIAL DEMANDED	
)		
Defendant.)		
)		
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COMPLAINT

Plaintiffs, J.P. Molyneux Studio, Ltd. and Juan Pablo Molyneux, complaining of the defendant, Jeffrey Epstein, by their attorney Rosh D. Alger, herein allege:

1. Plaintiff, J.P. Molyneux Studio, Ltd. is a corporation organized and existing under the laws of the State of New York and maintains its principle place of business within the State of New York.
2. Plaintiff Juan Pablo Molyneux at all times hereinafter mentioned was and is domiciled in the State of New York.
3. Upon information and belief, defendant Jeffrey Epstein, at all times hereinafter mentioned was domiciled in the Territory of the Virgin Islands.
4. This court has original jurisdiction of this action because the amount in controversy exceeds \$75,000, exclusive of costs and interests, and there is diversity of citizenship.

FIRST CLAIM FOR RELIEF

5. On or about May 15th, 2009, plaintiffs and defendant Jeffrey Epstein, among others, entered into a certain Agreement for Design Services (the “contract”), a copy of which is annexed hereto as Exhibit A.
6. Each of the parties was obligated by the implied covenant of good faith and fair dealing to take no steps to frustrate or obstruct performance of the contract by the other.
7. From the time of the contract, plaintiffs expended and became obligated to others in the sum of more than \$300,000 in the performance of their obligations under the contract.
8. From the start of plaintiffs’ performance of the terms of the contract, defendant Epstein acted in bad faith and unfairly to unreasonably and successfully frustrate and obstruct plaintiffs’ performance, making it impossible for plaintiffs to comply with the contractual terms.

WHEREFORE, plaintiffs demand judgment in a sum no less than \$300,000, together with interest, costs and disbursements.

Respectfully Submitted,
Rosh D. Alger Esquire, LLC
Attorney for Plaintiffs

Dated: 04/01/10

By: s/ Rosh D. Alger _____
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