

August 7, 2017

VIA EMAIL

Michael Miller, Esq.
Steptoe & Johnson, LLP
1114 Avenue of the Americas
New York NY 10036
mmiller@steptoe.com

Re: *Jane Doe 43 v. Jeffrey Epstein, et al.*
Case No.: 17-cv-616

Dear Mr. Miller,

We are in receipt of your Rule 11 notice wherein you state that Jane Doe 43 does not have a basis for alleging jurisdiction in New York. Specifically you stated in your letter to Judge Koeltl as follows:

“We respectfully submit that the Plaintiff’s Evidence provides grounds for this Court to dispose of the Action entirely, *inter alia*, under Rule 12(b)(2) for lack of personal jurisdiction. Because the Defendants have no present connection to New York upon which to confer personal jurisdiction, personal jurisdiction over the Defendants would have to be based on tortious conduct allegedly committed in New York. CPLR 302(a)(2). We respectfully submit that the Plaintiff’s Evidence is dispositive on the question of whether tortious conduct occurred during the limitations period upon which Plaintiff can based person jurisdiction, either under a four or ten year limitations period.”

Since we notice you will be relying on information outside the four corners of our complaint in making your motion to dismiss, we would also like to collect relevant evidence on the subject. Accordingly, we write to request that your client Jeffrey Epstein agree to sit for a short one hour deposition on jurisdictional matters. We believe that, in this short period of time, we could readily collect ample evidence that would demonstrate, unequivocally, answers to all of the questions that you have raised. We would also intend to explore your earlier representation to the Court that Epstein lacks contacts with the Southern District of New York. Please let us know a date that works for you and your client in the next two weeks for a one hour deposition of Jeffrey Epstein.



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In addition, you submitted a motion to Judge Koeltl requesting leave to file a Motion with Judge Sweet for the release of Jane Doe 43's transcript in the *Guiffre v. Maxwell* matter. It was our understanding you were going to be filing your motion with Judge Sweet on Monday, July 24, 2017 yet you failed to file the motion. Please confirm that you will be filing the motion by Monday, August 14, 2017. If you do not intend to file the motion in a timely manner we will be forced to raise the issue of intentional delay with Judge Koeltl.

Sincerely,

/s/ Sigrid McCawley
Sigrid McCawley

SM/akc

cc: Bradley Edwards (via E-mail)
Paul Cassell (via E-mail)
Stan Pottinger (via E-mail)