

Biros — so that they may promptly proceed with implementation of the Epstein Victims' Compensation Program (the "Program") and design of a Program protocol ("Protocol") to establish a fair, independent claims resolution process for purposes of resolving sexual abuse claims against Jeffrey E. Epstein, deceased. It is undisputed that Creditor Jane Doe and her counsel — as well as all other claimants and their counsel in the stateside litigations — will have the unfettered opportunity to provide their input on the Protocol. Only after the Protocol is developed and finalized will the Co-Executors submit it to the Court for approval, and will seek an order to formally commence claims resolution proceedings under the Program. In the event that Creditor Jane Doe objects to the Protocol (or any other aspect of the Program), she may lodge her objection with the Court at that time.

3. There is also an extraordinary danger in allowing Creditor Jane Doe to now slow down the design and implementation of the Program — the inevitable, unfortunate result of granting her request for an extension of time. As explained more fully in the Co-Executors' multiple applications to the Court noted above, a substantial risk exists that further delay will derail the proposed Program before it can succeed. That would be a disastrous result for both claimants and the Estate.

Accordingly, and as set forth more fully in the contemporaneously filed Request for *Immediate Hearing or Conference Regarding Expedited Motion for Establishment of a Voluntary*

Claims Resolution Program, it is respectfully requested that this Honorable Court deny the Motion for Extension of Time.

Respectfully,



CHRISTOPHER ALLEN KROBLIN, ESQ.
ANDREW W. HEYMANN, ESQ.
WILLIAM L. BLUM, ESQ.
SHARI N. D'ANDRADE, ESQ.
MARJORIE WHALEN, ESQ.
V.I. Bar Nos. 136, 966, 1221 & R2019
KELLERHALS FERGUSON KROBLIN PLLC
Royal Palms Professional Building

Dated: December 13, 2019

[REDACTED]
St. Thomas, V.I. 00802

Telephone: [REDACTED]

Facsimile: [REDACTED]

Email: [REDACTED]

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on this 13th day of December 2019, I caused a true and exact copy of the foregoing **Response to Creditor Jane Doe's Request for Extension of Time Re: Request for Ruling on Expedited Motion for Establishment of a Voluntary Claims Resolution Program** to be served via electronic mail upon:

John H. Benham, Esq.
Law Office of John H. Benham, P.C.
[REDACTED]
St. Thomas, VI 00801
[REDACTED]

Douglas B. Chanco, Esq.
ChancoSchiffer P.C.
[REDACTED]
Atlanta, GA 30326
[REDACTED]

A. Jeffrey Weiss, Esq.
A.J. Weiss & Associates
[REDACTED]
St. Thomas, VI 00802
[REDACTED]

Richard P. Bourne-Vanneck, Esq.
Law Offices of Richard Bourne-Vanneck
[REDACTED]
St. Thomas, VI 00802
[REDACTED]

Sean Foster, Esq.
Marjorie Rawls Roberts, P.C.
[REDACTED]
St. Thomas, VI 00804
[REDACTED]

[REDACTED]