

Merson Law, PLLC

950 Third Avenue, 18th Floor
New York, NY 10022
212-603-9100
Facsimile 347-441-4171
www.mersonlaw.com
Please mail all correspondence to NY office

**Merson Law, PLLC**

Pennsylvania Office
1525 Locust Street, 19th Floor
Philadelphia, PA 19102

December 6, 2024

Justice Reggie Walton
US District Court District of Columbia
333 Constitution Avenue, N.W.
Washington, .D.C. 20001

Dear Judge Walton:

My firm represents more than thirty sexual abuse survivors of Jeffrey Epstein with claims against the FBI. On September 25, 2024, eight (8) of the plaintiffs filed the initial Complaint. On October 18, 2024, eleven (11) more plaintiffs were added in the Amended Complaint. Since the six month administrative exhaustion has passed without hearing anything from the USA about resolution, six (6) additional plaintiffs want to join the lawsuit. Jennifer Plotkin and I have reached out repeatedly via telephone call and email to get the USA's consent to adding these plaintiffs to spare the Court and the parties from the unnecessary use of costs and resources in filing a motion or filing another case and consolidation. However, again there has not been any response from the government.

We also wanted to discuss providing the Jane Doe plaintiffs' identity, which the government requested and we will be prepared to do so when someone responds.

Based on the above, plaintiffs respectfully request that the Court schedule a conference or allow the Amended Complaint to again be amended for the sole purpose of adding the claims of these six (6) women.

Thank you for the Court's attention to, and consideration of, the above. We tried to avoid involving the Court, but we did not see any other option at this point.

Respectfully submitted,

Jordan Merson