

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALLYSON WARD, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

DARREN K. INDYKE and
RICHARD D. KAHN,

Defendants.

Case No. 1:24-cv-01204-AS

SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL FEMALES WHO WERE SEXUALLY ASSAULTED OR ABUSED OR TRAFFICKED BY JEFFREY EPSTEIN FROM JANUARY 1, 1995 TO AUGUST 10, 2019, WHETHER THEY WERE MINORS OR ADULTS AT THE TIME OF THEIR ASSAULT, ABUSE, OR TRAFFICKING, WHO HAVE NOT PREVIOUSLY EXECUTED A SETTLEMENT AGREEMENT THAT INCLUDED A RELEASE OF CLAIMS OR OTHERWISE RELEASED CLAIMS AGAINST THE ESTATE OF EPSTEIN, DARREN INDYKE, AND RICHARD KAHN, CO-EXECUTORS¹, AND ALSO INCLUDES THE NAMED PLAINTIFFS WHO, IN THIS LITIGATION, DID NOT VOLUNTARILY DISMISS THEIR CLAIMS.

THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.

YOU ARE HEREBY NOTIFIED that a hearing will be held on **September 16, 2026**, at 2:00 p.m., before the Honorable Arun Subramanian at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY, 10007 to determine whether: (1) the proposed settlement (the "Settlement") of the above captioned case ("Litigation") as set forth in the Settlement Agreement dated February 19, 2026² for \$35,000,000 in cash, if there are 40 or more eligible class members, or \$25,000,000 in cash, if there are fewer than 40 eligible class members, should be approved by the Court as fair, reasonable, and adequate; (2) the Judgment as provided under the Settlement Agreement should be entered dismissing the Litigation with prejudice; (3) to award Boies Schiller Flexner LLP attorneys' fees, costs, and expenses out of the Global Settlement Account (as defined in the Notice of Proposed Settlement of Class Action ("Notice")), which is discussed below and, if so, in what amount; (4) to award Named Plaintiffs who, in this Litigation, did not voluntarily dismiss their claims, an incentive award out of the Global Settlement Account; and (5) the Plan of Allocation (as described in the Settlement Agreement and Notice) should be approved by the Court as fair, reasonable, and adequate. The Court may adjourn or continue the Settlement Hearing, or hold it via telephone or video conference, without further notice to Class Members.

IF YOU WERE ABUSED OR TRAFFICKED BY JEFFREY EPSTEIN DURING THE PERIOD BETWEEN JANUARY 1, 1995 AND AUGUST 10, 2019, INCLUSIVE, WHETHER YOU WERE A MINOR OR ADULT AT THE TIME OF YOUR ABUSE OR TRAFFICKING, AND YOU, UNLESS YOU ARE A NAMED PLAINTIFF WHO, IN THIS LITIGATION, DID NOT VOLUNTARILY DISMISS YOUR CLAIMS, HAVE NOT PREVIOUSLY EXECUTED A SETTLEMENT THAT INCLUDED A RELEASE OF THE EPSTEIN ESTATE, YOUR RIGHTS ARE AFFECTED BY THE SETTLEMENT OF THIS LITIGATION.

To share in the distribution of the Settlement Fund, you must establish your rights by submitting a Questionnaire and Release through a secure, dedicated online portal (**no later than May 12, 2026**) or mailing your

¹ If you previously settled as part of the Epstein Victims' Compensation Program or settled a claim with the Epstein Estate privately, then you are ineligible to participate in this Settlement.

² The Settlement Agreement can be viewed and/or obtained at www.SDNYSettlementFund2026.com.

QUESTIONS? CALL 212-641-0800 OR VISIT WWW.SDNYSETTLEMENTFUND2026.COM

completed Questionnaire and Release to the Fund Administrator (must be postmarked by **no later than May 12, 2026**). Your failure to submit a Questionnaire and Release by **May 12, 2026** will result in a rejection of your claim and preclude you from receiving any recovery in connection with the Settlement of this Litigation.

To opt-out of the Settlement and preserve your claims related to the Litigation, you must send a signed letter by First-Class mail saying that you want to be excluded from the Class in the following Litigation: *Ward v. Indyke, et. al.*, No. 1:24-CV-01204 (AS). Be sure to include your name, address, and telephone number. Your exclusion request must be postmarked by no later than **April 13, 2026** and sent to the Fund Administrator at:

Simone Lechuk
Resolution Services LLC
c/o FREJKA PLLC
415 East 52nd Street | Suite 3
New York, New York 10022

If you were sexually abused or trafficked by Jeffrey Epstein between January 1, 1995 to August 10, 2019, inclusive, and you have not previously executed a settlement agreement that released the Epstein Estate, you will be bound by the Settlement and any judgment and release entered in the Litigation, including, but not limited to, the Judgment, whether or not you submit a Questionnaire and Release, unless you submit a timely signed letter to opt-out. For avoidance of doubt, if you do not opt-out, the Judgment and Release entered in this Litigation will include a release of all claims you may have against the Epstein Estate.

If you would like a copy of the Notice, which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement), or the Questionnaire and Release described herein, you may obtain these documents, as well as a copy of the Settlement Agreement (which, among other things, contains definitions for the defined terms used in this Summary Notice) and other Settlement documents, online at www.SDNYSettlementFund2026.com.

Inquiries should NOT be directed to Defendants, Defendants' Counsel, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for the Questionnaire and Release, may be made to Lead Counsel:

Sigrid McCawley
Andrew Villacastin
BOIES SCHILLER FLEXNER LLP
55 Hudson Yards
New York, NY 10001
Email: epsteinsettlement@bsflp.com
Telephone: 1-212-446-2300

IF YOU DESIRE TO BE EXCLUDED FROM THE CLASS, YOU MUST SUBMIT A SIGNED LETTER VIA FIRST-CLASS MAIL TO OPT-OUT OF THIS SETTLEMENT SUCH THAT IT IS **POSTMARKED BY APRIL 13, 2026, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE. ALL MEMBERS OF THE CLASS WHO HAVE NOT REQUESTED EXCLUSION FROM THE CLASS WILL BE BOUND BY THE SETTLEMENT EVEN IF THEY DO NOT SUBMIT A QUESTIONNAIRE AND RELEASE.**

IF YOU ARE A CLASS MEMBER, YOU HAVE THE RIGHT TO OBJECT TO THE SETTLEMENT, THE PLAN OF ALLOCATION, THE REQUEST BY CLASS COUNSEL NOT TO EXCEED THIRTY PERCENT (30%) OF THE SETTLEMENT AMOUNT AND COSTS AND EXPENSES NOT TO EXCEED \$1,000,000.00, PLUS INTEREST EARNED ON BOTH AMOUNTS AT THE SAME RATE AS EARNED IN THE QUALIFIED SETTLEMENT ACCOUNT. ANY OBJECTIONS MUST BE FILED WITH THE COURT AND RECEIVED BY CLASS COUNSEL AND DEFENDANTS' COUNSEL **BY AUGUST 26, 2026 IN THE MANNER AND FORM EXPLAINED IN THE NOTICE.**

DATED: MARCH 13, 2026

BY ORDER OF THE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

QUESTIONS? CALL 212-641-0800 OR VISIT WWW.SDNYSETTLEMENTFUND2026.COM