

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

JANE DOE,

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.

Defendant.

\_\_\_\_\_/

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,  
08-80994, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092

\_\_\_\_\_/

**PLAINTIFF JANE DOE'S OBJECTION TO EXTENSION OF TIME TO FILE APPEAL  
AND, IN THE ALTERNATIVE, REQUEST FOR DIRECTION TO EPSTEIN TO BEGIN  
ASSEMBLING MATERIALS**

Plaintiff, Jane Doe, respectfully files this Objection to Defendant's Motion for Extension of Time (dkt. #464).

Epstein is apparently requesting an additional 15 days from February 18, 2010, to file an objection to an order from the magistrate judge that he produce documents that were provided to him by the Government during the discovery phase of the criminal case. As the magistrate judge concluded, any purported Fifth Amendment objection to producing such documents is utterly groundless. The Fifth Amendment protects a defendant from revealing things to the Government that it does not know. The Government obviously knows what is in the documents that *it gave to him*. Therefore, there is no legitimate Fifth Amendment objection to such production.

**CASE NO: 08-CV-80119-MARRA/JOHNSON**

In addition, 15 days on top of the already prescribed 10 days to appeal is an excessively long period of time. As the Court is aware, the discovery period prescribed in this case will soon draw to a close. Jane Doe needs the documents produced quickly and in a timely fashion so that she can pursue any leads revealed in them during the discovery period.

In the alternative, if the Court grants any extension of time to file an appeal, Jane Doe respectfully requests that the extension order also include a direction to Epstein to fully assemble all of the required documents so that, if Epstein's appeal is rejected, the documents can be produced to Jane Doe without any further delay.

DATED: February 9, 2010

Respectfully submitted,

s/ Bradley J. Edwards  
Bradley J. Edwards  
FARMER, JAFFE, WEISSING,  
EDWARDS, FISTOS & LEHRMAN, P.L.  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301  
Telephone (954) 524-2820  
Facsimile (954) 524-2822  
Florida Bar No.: 542075  
E-mail: brad@pathtojustice.com

*and*

Paul G. Cassell  
Pro Hac Vice  
332 S. 1400 E.  
Salt Lake City, UT 84112  
Telephone: 801-585-5202  
Facsimile: 801-585-6833  
E-Mail: cassellp@law.utah.edu

CASE NO: 08-CV-80119-MARRA/JOHNSON

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 9, 2010 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically filed Notices of Electronic Filing.

s/ Bradley J. Edwards  
Bradley J. Edwards

CASE NO: 08-CV-80119-MARRA/JOHNSON

**SERVICE LIST**

**Jane Doe v. Jeffrey Epstein  
United States District Court, Southern District of Florida**

Jack Alan Goldberger, Esq.  
[Jgoldberger@agwpa.com](mailto:Jgoldberger@agwpa.com)

Robert D. Critton, Esq.  
[rcritton@bclclaw.com](mailto:rcritton@bclclaw.com)

Isidro Manual Garcia  
[isidrogarcia@bellsouth.net](mailto:isidrogarcia@bellsouth.net)

Jack Patrick Hill  
[iph@searcylaw.com](mailto:iph@searcylaw.com)

Katherine Warthen Ezell  
[KEzell@podhurst.com](mailto:KEzell@podhurst.com)

Michael James Pike  
[MPike@bclclaw.com](mailto:MPike@bclclaw.com)

Paul G. Cassell  
[cassellp@bclclaw.com](mailto:cassellp@bclclaw.com)

Richard Horace Willits  
[lawyerswillits@aol.com](mailto:lawyerswillits@aol.com)

Robert C. Josefsberg  
[rjosefsberg@podhurst.com](mailto:rjosefsberg@podhurst.com)

Adam D. Horowitz  
[ahorowitz@sexabuseattorney.com](mailto:ahorowitz@sexabuseattorney.com)

Stuart S. Mermelstein  
[ssm@sexabuseattorney.com](mailto:ssm@sexabuseattorney.com)