

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 10-80447-CIV-Marra/Johnson

C.L.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

DEFENDANT EPSTEIN'S MOTION FOR EXTENSION OF TIME IN WHICH TO FILE
REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANT EPSTEIN'S MOTION
FOR MORE DEFINITE STATEMENT & TO STRIKE & TO DISMISS
DIRECTED TO COUNT III OF PLAINTIFF C.L.'S COMPLAINT (DE 9)

Defendant, Jeffrey Epstein, (hereinafter "Epstein") by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to file his Reply to Plaintiff's Response to Defendant Epstein's Motion for More Definite Statement & to Strike & to Dismiss Directed to Count III of Plaintiff C.L.'s Complaint and as grounds therefore would state:

1. On May 3, 2010 Defendant filed his Motion for More Definite Statement & to Strike & to Dismiss Directed to Count III of Plaintiff C.L.'s Complaint (DE 5).
2. On May 26, 2010 Plaintiff filed her Response in Opposition to Defendant's Motion (DE 9).
3. There are several other cases filed with this Court in which Jeffrey Epstein is named a Defendant. In those cases, the undersigned has been handling other matters associated therewith.
4. Additionally, the undersigned will be out of town on a prearranged family vacation beginning June 4, 2010 and will return to the office on June 8, 2010.

5. An extension until June 17, 2010, is fair and reasonable under the circumstances.

The undersigned is in need of the additional time in order to fully and adequately prepare a reply on behalf of the Defendant.

6. As certified below, counsel for Defendant conferred with counsel for the Plaintiff by e-mail, and Plaintiff's counsel is in agreement with the requested extension.

WHEREFORE Defendant respectfully requests that this Court enter an order granting an extension until June 17, 2010, to file a Reply to Plaintiff's Response in Opposition to Defendant's Motion for More Definite Statement & to Strike & to Dismiss Directed to Count III of Plaintiff C.L.'s Complaint.

Local Rule 7.1 Statement

Counsel for the movant conferred by e-mail with counsel for the Plaintiff and counsel for Plaintiff is in agreement with the requested extension until June 17, 2010 for Defendant to Reply to Plaintiff's Response in Opposition.

/s/ Robert D. Critton Jr.
Robert D. Critton, Jr.
Attorney for Defendant Epstein

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following Service List in the manner specified by CM/ECF on this 4th day of June, 2010.

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Respectfully submitted,

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