UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80381-MARRA-JOHNSON

JANE DOE NO. 5,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.
_____/

DEFENDANT EPSTEIN'S MOTION TO EXCEED PAGE LIMITATION IN RESPONSE TO PLAINTIFF'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND PRODUCTION OF DOCUMENTS, INCLUDING SUPPORTING MEMORANDUM OF LAW

Defendant, JEFFREY EPSTEIN, by and through his undersigned counsel, moves to exceed the page limitation of 20 pages imposed by Loc. Gen. Rule 7.1. C. 2. (S.D. Fla.), in his supporting memorandum of law in response to *Plaintiff's Motion to Compel Answers to Interrogatories and Production of Documents, and Incorporated Memorandum of Law In Support*, dated March 2, 2009. In support of his motion, Defendant states:

1. This motion is being filed in an abundance of caution.

2. Local Gen. Rule 7.1 C. 2. provides in part that "absent prior permission of the court, no party shall file any legal memorandum exceeding twenty pages in length." Defendant is in the process of preparing his Response and Incorporated Memorandum of Law to Plaintiff's Motion to Compel, dated March 2, 2009, (and due by an extension to March 25, 2009). Although the memorandum of law incorporated into the response

will be less than 20 pages, it is likely that the entire response, including the memorandum, will be in excess of 20 pages.

3. A length exceeding 20 pages is required so that Defendant may fully address the issues raised in Plaintiff's motion to compel which are directed to Defendant's answers to interrogatories and Defendant's response to Plaintiff's production request. Plaintiff served 23 interrogatories and 25 production requests to which Defendant raised individualized constitutional guarantees and additional objections. In order to present Defendant's response in an organized and understandable manner, the 20 page limitation is required to be exceeded.

WHEREFORE, Defendant respectfully requests that this Court grant Defendant's motion, and enter an order allowing a response, including memorandum of law, which is in excess of 20 pages.

Rule 7.1 Certification

Pursuant to communication by telephone, Plaintiff's counsel has no objection to the request to exceed 20 pages herein.

Robert D. Critton, Jr.
Attorney for 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 18th day of March, 2009:

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Respectfully submitted,

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ORDER ON DEFENDANT EPSTEIN'S MOTION TO EXCEED PAGE LIMITATION IN RESPONSE TO PLAINTIFF'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND PRODUCTION OF DOCUMENTS, INCLUDING SUPPORTING MEMORANDUM OF LAW

This matter came before the Court on Defendant's, JEFFREY EPSTEIN, Motion to Exceed Page Limitation in Response to Plaintiff's Motion to Compel Answers to Interrogatories and Production of Documents, Including Supporting Memorandum of Law. Having considered Defendant's motion and Plaintiff's counsel being in agreement with the request to exceed page limtation, it is HEREBY ORDERED and ADJUDGED that:

Defendant's motion is GRANTED. Defendant's Response to Plaintiff's Motion to Compel Answers to Interrogatories and Production of Documents, Including Supporting Memorandum of Law may exceed 20 pages.

DONE and ORDERED this ____day of _____, 2009.

_____
Kenneth A. Marra
United States District Judge

Courtesy Copies: Counsel of Record