

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO.2,

Plaintiff,

CASE NO.; 08-CV-80119-MARRA/JOHNSON

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO.3,

CASE NO.; 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO.4,

CASE NO.; 08-CV-80380-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5,

CASE NO.; 08-CV-80381-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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JANE DOE NO. 6,

Plaintiff,
vs.

CASE NO.; 08-CV-80994-MARRA/JOHNSON

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 7,

Plaintiff,
vs.

CASE NO.; 08-CV-80993-MARRA/JOHNSON

JEFFREY EPSTEIN,

Defendant.

C.M.A.,

Plaintiff,
vs.

CASE NO.; 08-CV-80811-MARRA/JOHNSON

JEFFREY EPSTEIN,

Defendant.

JANE DOE,

Plaintiff,
vs.

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

JEFFREY EPSTEIN, et al.,

Defendants.

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DOE II,

Plaintiff,

CASE NO.; 08-CV-80469-MARRA/JOHNSON

vs.

JEFFREY EPSTEIN, et al,

Defendants.

JANE DOE NO. 101,

CASE NO.; 08-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 102,

CASE NO.; 08-CV-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

DEFENDANT, EPSTEIN'S RESPONSE IN OPPOSITION TO PLAINTIFFS'
JANE DOE'S 2 THROUGH 7, MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO DEFENDANT'S MOTION TO COMPEL
AND/OR IDENTIFY JANE DOE IN THE STYLE ET AL.

Defendant, JEFFERY EPSTEIN, (EPSTEIN), by and through his undersigned attorneys, hereby files his Response in Opposition to Plaintiffs' Motion for Enlargement of Time to Respond to Epstein's Motion to Compel and/or Identify Jane Doe in the style

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of this case and Motion to Identify Jane Doe in Third-Party Subpoenas for purposes of Discovery, or alternatively Motion to Dismiss Sua Sponte, and states as follows:

1. Epstein filed the Motion to Compel and/or Identify Jane Doe's 2 through 7 on May 5, and 6, 2009.

2. Plaintiffs' Response is due on May 22, 2009. While the undersigned counsel agreed that Plaintiffs could have an extension of time of one week to file and serve their opposition Motion (i.e., until May 29, 2009), Plaintiffs do not find it a reasonable agreement. Plaintiffs have requested an additional twenty (20) days to respond to the Motion to Compel and/or Identify. As set forth in the Motion to Compel and/or Identify, the failure and/or refusal to allow Epstein to identify Jane Doe's 2 through 7 in various third-party subpoenas is preventing meaningful discovery and the preparation of Epstein's defenses in this matter in anticipation of trial. The Motion to Compel and/or Identify Jane Doe is incorporated herein by reference. Therefore, all those arguments apply herein.

3. As set forth in the Motion to Compel and/or Identify, Jane Doe Numbers 2 through 7, these cases have been filed for some time. Therefore, discovery should have been permitted so that Epstein would be able to properly prepare and defend the claims brought against him by Jane Doe Numbers 2 through 7. Plaintiffs, and their counsel, have not agreed to the relief set forth in the Motion to Compel and/or Identify Jane Doe Numbers 2 through 7. CMA agreed to such relief. **Exhibit "A"**. Therefore, any extension granted to Jane Doe's Numbers 2 through 7 will further delay discovery

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in this matter. Such a delay has been addressed by Epstein filing his Motion to Strike cases from the current trial docket, dated May 19, 2009.

4. Discovery should not be delayed in these matters any longer.

WHEREFORE, Epstein hereby respectfully requests that an Order be entered requiring Plaintiffs, Jane Doe's #2 through #7 to file their opposition Motion to the Motion to Compel and/or Identify on or before May 29, 2009, and for such other and further relief as this Court deems just and proper.



Michael J. Pike, Esq.
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 27 day of May, 2009:

Stuart S. Mermelstein, Esq.
Adam D. Horowitz, Esq.
Mermelstein & Horowitz, P.A.
18205 Biscayne Boulevard
Suite 2218
Miami, FL 33160
305-931-2200
Fax: 305-931-0877
ssm@sexabuseattorney.com
ahorowitz@sexabuseattorney.com
Counsel for Plaintiff Jane Doe #2

Jack Alan Goldberger
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
561-659-8300
Fax: 561-835-8691
jagesq@bellsouth.net
Co-Counsel for Defendant Jeffrey Epstein

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Respectfully submitted,

By: 

ROBERT D. CRITTON, JR., ESQ.

Florida Bar No. 224162

rcrit@bclclaw.com

MICHAEL J. PIKE, ESQ.

Florida Bar #617296

mpike@bclclaw.com

BURMAN, CRITTON, LUTTIER & COLEMAN

515 N. Flagler Drive, Suite 400

West Palm Beach, FL 33401

561/842-2820 Phone

561/515-3148 Fax

(Counsel for Defendant Jeffrey Epstein)