

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Related cases:

08-80232, 08-08380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

**JOINT UNOPPOSED MOTION FOR EXTENSION
OF TIME IN WHICH TO RESPOND TO PLAINTIFF JANE DOE'S MOTIONS
TO COMPEL RESPONSES TO REQUEST TO PRODUCE, ANSWERS TO
REQUEST FOR ADMISSIONS, AND ANSWERS TO INTERROGATORIES**

Defendant, JEFFREY EPSTEIN, and Plaintiff, JANE DOE, by and through their undersigned counsel move this Court for an Extension of Time until September 11, 2009, to file Responses to Plaintiff Jane Doe's Motions to Compel Responses to Request to Produce, Answers to Request for Admissions, and Answers to Interrogatories, pursuant to Local Rule 7.1 A.1(j)(S.D. Fla. 2008). As good cause for the requested extension, Defendant states:

1. Brad Edwards, Counsel for the Plaintiff, is currently recovering from a surgical procedure. Mr. Edwards is scheduled to return to the office on Tuesday, September 8, 2009.

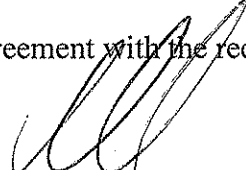
2. Mr. Edwards and the undersigned have agreed to review the above Motions in an effort to determine whether any of the issues therein are covered by the Court's Order on other 5th Amendment Privilege issues (DE 242).

3. The undersigned counsel has spoken with Brad Edwards' law partner, William Berger, and each party has agreed to the extension of time until September 11, 2009.

4. While the undersigned lawyers are attempting to resolve certain issues in the above motions to conserve on judicial resources, no admissions are being made in this Motion and no arguments are being abandoned.

Rule 7.1 A.3 Certification of Pre-Filing Conference

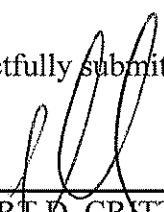
Counsel for Defendant conferred with Counsel for Plaintiff by telephone and/or electronic mail, and Counsel for Plaintiff is in agreement with the requested extension.

By: 
MICHAEL J. PIKE, ESQ.
Florida Bar #617296

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 3rd day of September, 2009

Respectfully submitted,

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Certificate of Service
Jane Doe No. 2 v. Jeffrey Epstein
Case No. 08-CV-80119-MARRA/JOHNSON

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