

**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, 08-80380, 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.

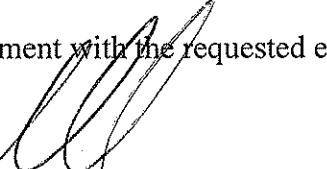
2. Mr. Edwards and the undersigned have agreed to review the above Motions in an effort to determine whether any of the issues therein are covered by the Court's Order on other 5th Amendment Privilege issues (DE 242).

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.

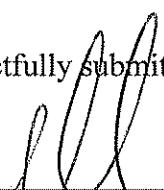
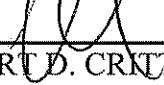
Rule 7.1 A.3 Certification of Pre-Filing Conference

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,

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)

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

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 Plaintiffs
In related Cases Nos. 08-80069, 08-80119,
08-80232, 08-80380, 08-80381, 08-80993,
08-80994

Richard Horace Willits, Esq.
Richard H. Willits, P.A.
2290 10th Avenue North
Suite 404
Lake Worth, FL 33461
561-582-7600
Fax: 561-588-8819
Counsel for Plaintiff in Related Case No.
08-80811
reelrhw@hotmail.com

Jack Scarola, Esq.

Brad Edwards, Esq.
Rothstein Rosenfeldt Adler
401 East Las Olas Boulevard
Suite 1650
Fort Lauderdale, FL 33301
Phone: 954-522-3456
Fax: 954-527-8663
bedwards@rra-law.com
Counsel for Plaintiff in Related Case No.
08-80893

Paul G. Cassell, Esq.
Pro Hac Vice
332 South 1400 E, Room 101
Salt Lake City, UT 84112
801-585-5202
801-585-6833 Fax
cassellp@law.utah.edu
Co-counsel for Plaintiff Jane Doe

Isidro M. Garcia, Esq.
Garcia Law Firm, P.A.
224 Datura Street, Suite 900
West Palm Beach, FL 33401
561-832-7732
561-832-7137 F
isidrogarcia@bellsouth.net

Jack P. Hill, Esq. Searcy Denney Scarola Barnhart & Shipley, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 561-686-6300 Fax: 561-383-9424 jsx@searcylaw.com jph@searcylaw.com <i>Counsel for Plaintiff, C.M.A.</i>	<i>Counsel for Plaintiff in Related Case No.</i> 08-80469 Robert C. Josefsberg, Esq. Katherine W. Ezell, Esq. Podhurst Orseck, P.A. 25 West Flagler Street, Suite 800 Miami, FL 33130 305 358-2800 Fax: 305 358-2382 rjosefsberg@podhurst.com kezell@podhurst.com <i>Counsel for Plaintiffs in Related Cases</i> <i>Nos. 09-80591 and 09-80656</i>
Bruce Reinhart, Esq. Bruce E. Reinhart, P.A. 250 S. Australian Avenue Suite 1400 West Palm Beach, FL 33401 561-202-6360 Fax: 561-828-0983 ecf@brucereinhartlaw.com <i>Counsel for Defendant Sarah Kellen</i>	Jack Alan Goldberger, Esq. 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 <i>Counsel for Defendant Jeffrey Epstein</i>