

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2,

Petitioners,

v.

UNITED STATES,

Respondent.

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA-FTL

FILED BY _____ D.C.

2014 MAY 16 PM 4:00

SEALED DOCUMENT

MOTION TO SEAL

Petitioners Jane Doe #1 and Jane Doe #2 (also referred to as “the victims”), through counsel, hereby move to seal their **DOE 1 AND JANE DOE 2'S RESPONSE IN OPPOSITION TO EPSTEIN'S MOTION FOR A PROTECTIVE CONFIDENTIALITY ORDER** for the following reasons:

1. This Honorable Court's Order [DE 249 at 1] states that “...petitioners should not comply with the Order Granting Petitioners' Motion to Proffer Government Correspondence in Support of CVRA Claims & Granting Motion to Unseal Correspondence and Related Unredacted Pleadings of Petitioners (DE 188) until further order of this Court.”
2. Petitioners seek leave to file this **DOE 1 AND JANE DOE 2'S RESPONSE IN OPPOSITION TO EPSTEIN'S MOTION FOR A PROTECTIVE CONFIDENTIALITY ORDER** under seal, in an abundance of caution, because it discusses material that Epstein has Moved to prevent the disclosure of, and the Court has ordered the victims not to file other similar material in its previous Order [DE 249].

3. While the victims, for all of the reasons stated previously by this Court and those recounted within their Response, do not believe that their Response or any of the materials contained therein should be sealed, we are proceeding with extreme caution so as to allow the Court to definitively decide that issue before any materials subject to Epstein's Motion are made part of the public file.

WHEREFORE, Petitioners respectfully request that **DOE 1 AND JANE DOE 2'S RESPONSE IN OPPOSITION TO EPSTEIN'S MOTION FOR A PROTECTIVE CONFIDENTIALITY ORDER** be sealed until further order of the Court. Alternatively, if the Court denies the instant motion to seal, then Petitioners respectfully request that their Response in Opposition to Epstein's Motion for Protective Order be filed in the public file and docketed as of today's date, as timely filed.

DATED: May 16, 2014.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on May 16, 2014, on the following using the Court's CM/ECF system:

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/s/ Bradley J. Edwards