

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  
\_\_\_\_\_

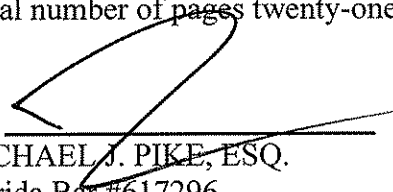
**DEFENDANT EPSTEIN'S MOTION TO EXCEED PAGE LIMITATION IN  
RESPONSE IN OPPOSITION TO PLAINTIFF'S, JANE DOE, MOTION TO  
COMPEL RESPONSE TO PLAINTIFF'S REQUEST FOR PRODUCTION  
DE (194), WITH INCORPORATED MEMORANDUM OF LAW**

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 in Opposition to *Plaintiff's Motion to Compel Response to Plaintiff's Request for Production, with Incorporated Memorandum of Law*. In support of his motion, Defendant states:

1. 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."

2. In order to present Defendant's response in an organized and understandable manner, the 20 page limitation is required to be exceeded by one (1) page.


WHEREFORE, Defendant respectfully requests that this Court grant Defendant's motion, and enter an order allowing the Response in Opposition, to exceed the maximum limit of 20 pages by one (1) page, making the total number of pages twenty-one (21).

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 6<sup>th</sup> day of October, 2009

Respectfully submitted,

By:   
ROBERT D. CRITTON, JR., ESQ.  
Florida Bar No. 224162  
[rcrit@bclclaw.com](mailto:rcrit@bclclaw.com)  
MICHAEL J. PIKE, ESQ.  
Florida Bar #617296  
[mpike@bclclaw.com](mailto: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](mailto:ssm@sexabuseattorney.com)  
[ahorowitz@sexabuseattorney.com](mailto: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 10<sup>th</sup> Avenue North  
Suite 404  
Lake Worth, FL 33461  
561-582-7600  
Fax: 561-588-8819  
*Counsel for Plaintiff in Related Case No.*  
*08-80811*  
[reelrhwh@hotmail.com](mailto:reelrhwh@hotmail.com)

Jack Scarola, Esq.  
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](mailto:jsx@searcylaw.com)  
[jph@searcylaw.com](mailto:jph@searcylaw.com)  
*Counsel for Plaintiff, C.M.A.*

Bruce Reinhart, 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](mailto: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](mailto: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](mailto:isidrogarcia@bellsouth.net)  
*Counsel for Plaintiff in Related Case No.*  
*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](mailto:rjosefsberg@podhurst.com)  
[kezell@podhurst.com](mailto:kezell@podhurst.com)  
*Counsel for Plaintiffs in Related Cases*

Bruce E. Reinhart, P.A.  
250 S. Australian Avenue  
Suite 1400  
West Palm Beach, FL 33401  
561-202-6360  
Fax: 561-828-0983  
[ecf@brucereinhardt.com](mailto:ecf@brucereinhardt.com)  
*Counsel for Defendant Sarah Kellen*

*Nos. 09-80591 and 09-80656*

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](mailto:jagesq@bellsouth.net)  
*Counsel for Defendant Jeffrey Epstein*