

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

JANE DOE NO. 2,

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

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.
_____ /

JANE DOE NO. 3,

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

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.
_____ /

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

JANE DOE NO. 4,

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.
_____ /

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

JANE DOE NO. 5,

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-80994-CIV-MARRA/JOHNSON

JANE DOE NO. 6,

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-80993-CIV-MARRA/JOHNSON

JANE DOE NO. 7,

Plaintiff,

JEFFREY EPSTEIN

Defendant.

C.M.A.,

CASE NO.: 08-80811-CIV-MARRA/JOHNSON

Plaintiff,

JEFFREY EPSTEIN

Defendant.

JANE DOE,

CASE NO.: 08-80893-CIV-MARRA/JOHNSON

Plaintiff,

JEFFREY EPSTEIN et al,

Defendants.

_____ /

DOE II,

CASE NO.: 09-80469-CIV-MARRA-JOHNSON

Plaintiff,

JEFFREY EPSTEIN et al,

Defendants.

_____ /

JANE DOE NO. 101,

CASE NO.: 09-80591-CIV-MARRA-JOHNSON

Plaintiff,

JEFFREY EPSTEIN

Defendant.

_____ /

JANE DOE NO. 102,

CASE NO.: 09-80656-CIV-MARRA/JOHNSON

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

_____ /

**UNOPPOSED MOTION FOR EXTENSION OF TIME IN WHICH TO SUBMIT
AGREED ORDER PURSUANT TO COURT ORDER(DE 192)**

Defendant, Jeffrey Epstein (hereinafter "Epstein"), by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to submit an

Agreed Order, if possible, pursuant to this Court's Order dated July 7, 2009 (DE 192) granting Plaintiffs Jane Doe No. 101 and Jane Doe 102's Motion for an Order for Preservation of Evidence. As good cause in support of granting the motion, Defendant states:

1. On May 26, 2009, Plaintiffs Jane Doe 101 and Jane Doe 102, filed a Motion for an Order for Preservation of Evidence with Incorporated Memorandum of Law (DE 114).

2. On June 10, 2009, Defendant Epstein, filed his Response in Opposition to Plaintiffs' Motion (DE 151).

3. On June 22, 2009, Plaintiffs filed their Reply to Defendant's Response in Opposition (DE 168).

4. On July 7, 2009, this Court entered an Order directing parties to attempt to submit an agreed order granting Plaintiffs' Motion on or before July 20, 2009 (DE 192).

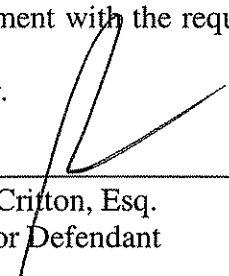
5. Both Plaintiff and Defense counsel need an additional five (5) days to attempt to reach an agreement.

6. As certified below, counsel for Defendant conferred with counsel for Plaintiffs, and Plaintiffs' counsel is in agreement with the requested extension.

WHEREFORE Defendant respectfully requests that this Court enter an Order granting an extension until July 24, 2009, to file an agreed order.

Local Rule 7.1 Statement

Counsel for the movant conferred by telephone and correspondence with counsel for the Plaintiffs and counsel for Plaintiffs' is in agreement with the requested extension until July 24, 2009 for the parties to file an agreed order.

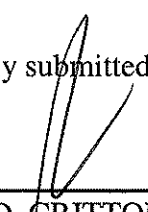


Robert D. Crifton, Esq.
Attorney for Defendant

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 20th day of July, 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

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

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*
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
jph@searcylaw.com
Counsel for Plaintiff, C.M.A.

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@brucereinhardt.com
Counsel for Defendant Sarah Kellen

Theodore J. Leopold, Esq.
Spencer T. Kuvin, Esq.
Ricci-Leopold, P.A.
2925 PGA Blvd., Suite 200
Palm Beach Gardens, FL 33410
561-684-6500
Fax: 561-515-2610
*Counsel for Plaintiff in Related Case No.
08-08804*
skuvin@riccilaw.com
tleopold@riccilaw.com

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
*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
kezell@podhurst.com
*Counsel for Plaintiffs in Related Cases
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
Counsel for Defendant Jeffrey Epstein