

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

/

JANE DOE NO. 4,

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

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

JANE DOE NO. 5,

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

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

JANE DOE NO. 6.

CASE NO: 08-CV-80994-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

JANE DOE NO. 7,

CASE NO: 08-CV-80993-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

CASE NO: 08-CV-80811-MARRA/JOHNSON

C.M.A.,

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

JANE DOE,

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

Plaintiff,

Vs.

JEFFREY EPSTEIN, et al.

Defendant.

/

DOE II,

CASE NO: 09-CV-80469-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN, et al.

Defendants.

/

JANE DOE NO. 101,

CASE NO: 09-CV-80591-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

CASE NO: 09-CV-80656-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

**PLAINTIFF, JANE DOE'S UNOPPOSED MOTION TO EXCEED PAGE LIMITATION
IN HER REPLY TO DEFENDANT'S MEMORANDUM OF LAW IN OPPOSITION TO
JANE DOE'S MOTION FOR INJUNCTION RESTRAINING FRAUDULENT
TRANSFER OF ASSETS**

Plaintiff, Jane Doe, hereby moves to exceed the page limitation of 10 pages for a reply memorandum of law found in Local Rule 7.1C.2.

Jane Doe is preparing a reply to Defendant's opposition to her motion for an injunction restraining fraudulent transfer of assets. Local Rule 7.1.C.2. provides that “[a]bsent prior permission of the court” a reply memorandum of law may not exceed 10 pages in length. It is clear that, given the many issues raised by defendant's opposition to Plaintiff's motion (which opposition is itself 24 pages long) that more than 10 pages

will be required to fully and adequately respond to and discuss the issues raised. Moreover, the issues raised are quite complicated, as they go to questions surrounding how the court should respond to fraudulent transfers of substantial assets to overseas locations by defendant Jeffrey Epstein, a billionaire. In addition, substantial financial assets are at stake; Jane Doe has moved, for example, for a receiver to take control of Defendant's assets to permit the posting of a \$15 million bond.

As certified below, Defendant's counsel have agreed to the request to exceed 10 pages.

WHEREFORE, Jane Doe respectfully requests that this Court grant her motion and enter an order allowing a reply in excess of 10 pages.

Local Rule 7.1 statement

Counsel for movant Jane Doe have conferred with counsel for the defendant, and counsel for Defendant kindly agreed to the requested filing in excess of ten pages.

DATED July 20, 2009

Respectfully Submitted,

s/ Bradley J. Edwards
Bradley J. Edwards
ROTHSTEIN ROSENFELDT ADLER
Las Olas City Centre
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33301
Telephone (954) 522-3456
Facsimile (954) 527-8663
Florida Bar No.: 542075
E-mail: bedwards@rra-law.com

and

Paul G. Cassell
Pro Hac Vice

332 S. 1400 E.
Salt Lake City, UT 84112
Telephone: 801-585-5202
Facsimile: 801-585-6833
E-Mail: cassellp@law.utah.edu

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 20, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically filed Notices of Electronic Filing.

s/ Bradley J. Edwards
Bradley J. Edwards

SERVICE LIST
Jane Doe v. Jeffrey Epstein
United States District Court, Southern District of Florida

Jack Alan Goldberger, Esq.
Jgoldberger@agwpa.com

Robert D. Critton, Esq.
rcritton@bclclaw.com

Isidro Manual Garcia
isidrogarcia@bellsouth.net

Jack Patrick Hill
iph@searcylaw.com

Katherine Warthen Ezell
KEzell@podhurst.com

Michael James Pike
MPike@bclclaw.com

Paul G. Cassell
cassellp@bclclaw.com

Richard Horace Willits
lawyerswillits@aol.com

Robert C. Josefsberg
rjosefsberg@podhurst.com

Adam D. Horowitz
ahorowitz@sexabuseattorney.com

Stuart S. Mermelstein
ssm@sexabuseattorney.com

William J. Berger
wberger@rra-law.com