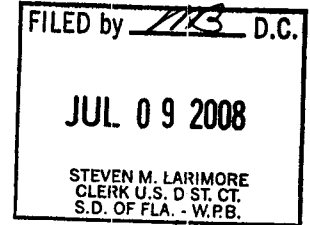


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80736-CIV-MARRA/JOHNSON

IN RE: JANE DOE,

Petitioner.



UNITED STATES' MOTION TO FILE RESPONSE TO VICTIM'S EMERGENCY
PETITION FOR ENFORCEMENT OF VICTIM RIGHTS ACT
AND DECLARATION OF A. MARIE VILLAFANA UNDER SEAL

The United States of America, by and through its undersigned counsel, files its Motion to File Response to Victim's Emergency Petition for Enforcement of Victim Rights Act and Declaration of A. Marie Villafaña Under Seal, pursuant to S.D. Fla. L.R. 5.4 and 18 U.S.C. § 3509(d)(2), and states:

On July 7, 2008, petitioner filed her Emergency Victim's Petition for Enforcement of Crime Victim Rights Act, 18 U.S.C. § 3771. Petitioner did not disclose her name, and alleges that she was a minor child when she was the victim of federal crimes committed by Jeffrey Epstein. Petition, ¶ 1.

On July 7, 2008, the Court directed the Government to file a response to the Petition by July 9, 2008, at 5:00 p.m.

The Government has prepared its Response, which is attached as Exhibit A, and the Declaration of Assistant United States Attorney A. Marie Villafaña, as well as correspondence with several individuals who were minors when the relevant events occurred. Additionally, the Government's Response also refers to actions taken by the United States Attorney's Office with an interested party which was done in confidence. The Government believes that its Response should

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be filed under seal, in order to protect the minor victims' privacy, as well as to maintain the confidentiality of the agreement reached with an interested party.

The Government requests that its Response and the Declaration be sealed until the termination of the instant litigation, or five years from the date of filing, whichever occurs first. Upon the expiration of the time period for sealing, the Government requests the documents be returned to the United States Attorney's Office.

WHEREFORE, the government respectfully requests that its Response to Victim's Emergency Petition for Enforcement of Crime Victim Rights Act, 18 U.S.C. § 3771, and the Declaration of A. Marie Villafaña be filed under seal.

Respectfully submitted,

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

By:



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Attorney for Respondent

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via facsimile transmission and U.S. Mail, this 9th day of July, 2008, to: Brad Edwards, Esq., The Law Offices of Brad Edwards & Associates, LLC, (954) 924-1530, 2028 Harrison Street, Suite 202, Hollywood, Florida 33020.


DEXTER A. LEE
Assistant U.S. Attorney