



Sigrid S. McCawley, Esq.  
Telephone: (954) 356-0011  
Email: [smccawley@bsflp.com](mailto:smccawley@bsflp.com)

December 11, 2018

**VIA CM/ECF**

Honorable Magistrate Judge Sarah Netburn  
United States District Court  
Thurgood Marshall Courthouse  
40 Foley Square, Rm 430  
New York, NY 10007

**Re: *Jane Doe 43 v. Jeffrey Epstein, et al.*,  
Case No.: 17-cv-00616-JGK-SN – Letter Motion Seeking Extension of Time  
to File Expert Witness Report**

Dear Judge Netburn,

We write today to request a short extension of time to the expert witness report deadline in this matter. Presently, under the schedule, any expert report would need to be submitted by December 24, 2018. Plaintiff's experts have been traveling out of the country and have been unavailable and therefore, Plaintiff respectfully requests that it be granted until January 18, 2019 to submit her expert report, with Defendants' rebuttal reports to follow 30 days later. This proposal should not interfere with the fact discovery deadline of January 25, 2019, nor alter the March 15, 2019 trial date. Plaintiff has conferred with the Defendants on this issue and they were not amenable to the relief sought.

Plaintiff has not asked for any extensions of time in this matter that resulted from its own conduct<sup>1</sup> and is only seeking this extension as a result of unavoidable conflicts in her expert's schedule.

Sincerely,

*Sigrid S. McCawley*  
Sigrid S. McCawley

cc: All Counsel of Record

<sup>1</sup> On January 31, 2018, Plaintiff filed a letter motion to Judge Koelzl requesting an extension of to file a consolidated opposition to Defendants' Motion to Dismiss (DE79 & 80) and Defendants' Supplemental Motion to Dismiss (DE 104 & 105) because multiple defendants were filing briefs at different times and the extension was related to that consolidation.