

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, 08-80893, 09-80469, 09-80802,
09-81092

**DEFENDANT'S AGREED MOTION FOR EXTENSION OF TIME
TO FILE REPLY TO JANE DOE AND DOES 2 -8' MEMORANDUM RESPONSE
TO DEFENDANT'S RULE 4 APPEAL (DEs 551 & 552)**

Defendant, Jeffrey Epstein, (hereinafter "Epstein") by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to Reply to Jane Doe's and Does 2-8' Memorandum Response to Defendant's Consolidated Rule 4 Appeal dated May 28, 2010. Defendant seeks an extension until June 14, 2010, to file his Reply and Plaintiffs' are in agreement with the requested extension. As good cause in support of granting the motion, Defendant states:

1. Defendant filed his Appeal of Magistrate Judge Decision on May 12, 2010 (DE 545).
2. Plaintiffs filed their Memorandum Response to Defendant's Rule 4 Appeal on May 28, 2010 (Des 551 & 552).

3. As this Court is aware, the undersigned represents the Defendant in nine (9) other related cases before this Court and three (3) cases in State Court, as well as a newly filed case before Judge Gold. Defendant has filed numerous Motions, Responses and Replies in all of these cases, and has filed numerous pre-trial motions before this Court in order to comply with this Court's trial orders and deadlines. Further, Defendant has and continues to prepare for and take numerous depositions in each of these cases.

4. The undersigned will be out of town from June 4, 2010 and will return to the office on June 8, 2010. This is and has been a prearranged family vacation.

5. The requested extension is fair in reasonable under the circumstances as it will provide time to allow the Defendant, EPSTEIN, to fully and adequately Reply to the opposition motions.

6. Initially, counsel for Does 2-8 agreed to an extension up to June 17, 2010. However, counsel for Jane Doe objected. Therefore, counsel for Jane Doe agreed to an extension up to June 14, 2010. In good faith, the undersigned agreed to file the consolidated Reply as to Jane Doe and Does 2-8 on June 14, 2010.

WHEREFORE, Defendant requests that this Court enter an Order granting the Defendant an extension until June 14, 2010 in which to Reply to Jane Doe and Does 2-8' opposition motions.

Local Rule 7.1 Certification

Counsel for the movant conferred by electronic mail with counsel for the Plaintiffs and Counsel for the Plaintiffs is in agreement with the requested extension until June 14, 2010.

/s/ Michael J. Pike
Robert D. Critton, Jr.
Michael J. Pike



Attorneys for Defendant Epstein

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 3rd day of June, 2009

Respectfully submitted,

By: /s/ Michael J. Pike
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, LLP
303 Banyan Blvd., 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

Brad Edwards, Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos
& Lehrman, PL
425 N. Andrews Avenue
Suite 2
Fort Lauderdale, FL 33301
Phone: 954-524-2820

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

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

Fax: 954-524-2822
brad@pathtojustice.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
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