

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, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

/

**JOINT MOTION FOR AN EXTENSION OF TIME
TO COMPLETE DISCOVERY**

Defendant, JEFFREY EPSTEIN, by and through his undersigned attorneys, and Plaintiff, JANE DOE, by and through her undersigned attorneys respectfully moves this Court for an extension of time to complete discovery deadlines, and as good cause in support of granting the motion, states as follows:

1. This case is currently set on a two week trial docket commencing on July 19, 2010.
2. The Amended Complaint filed by the Plaintiff is still the subject of a Motion to Dismiss filed on June 12, 2009 (DE 87). Thus, an Answer has not yet been filed.
3. The majority of the deposition of Plaintiff has occurred; however, several witness depositions have yet to occur.

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4. The scheduling of depositions in this matter has become much more difficult since the case was consolidated on May 14, 2009, due to the number of attorneys involved and the fact that witnesses, plaintiffs and the defendant may only be deposed once. (See Order Consolidating Cases for Purpose of Discovery and Procedural Motions That Relate to Multiple Cases).

5. Due the fact that depositions are still being scheduled, both Plaintiff and Defendant are in agreement with extending the discovery cutoff an additional two (2) week from April 2, 2010, making the new discovery cutoff date April 16, 2010.

WHEREFORE, Plaintiff and Defendant request that this Court enter an order granting the Motion for Extension of Time to Complete Discovery

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

Counsel for the movant conferred via e-mail with counsel for the Plaintiff and counsel for the Plaintiff is in agreement with moving the above date.

By: /s/ Michael J. Pike
MICHAEL J. PIKE, ESQ.
Florida Bar #617296

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 19th day of February, 2010.

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Respectfully submitted,

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