

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 DEADLINES**

Defendant, JEFFREY EPSTEIN, by and through his undersigned attorneys, and Plaintiffs, JANE DOES 2-7, by and through their 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. These cases are currently set on a two week trial docket commencing on September 27, 2010.
2. The depositions of Plaintiffs have been taken but a number of depositions remain to be completed for the parties, including a number of out of state depositions. Plaintiffs' counsel and Defendant's counsel are working together to schedule these depositions.

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3. 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). Additionally, many of the witnesses retained their own counsel, and the depositions need to be coordinated with those attorneys' schedules.

5. Due to the fact that depositions are still being scheduled, both Plaintiffs and Defendant are in agreement with extending the discovery cutoff in **Jane Does 2-7** July 2, 2010.

6. All other deadlines remain in effect. The parties have filed dispositive motions in accordance with the Court's Order, and will be exchanging expert reports beginning May 14, 2010.

WHEREFORE, Plaintiffs 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 parties conferred via e-mail and are in agreement with moving the above dates.

By: /s/ Robert D. Critton
ROBERT D. CRITTON, ESQ.
Florida Bar # 224162
MICHAEL J. PIKE, ESQ.
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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 11th day of May, 2010.

Respectfully submitted,

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