

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE #1 AND JANE DOE #2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

/

**RESPONDENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO COMPLY WITH COURT'S ORDER TO FILE PLEADINGS IN PUBLIC PORTION OF COURT FILE**

Respondent United States of America, by and through the undersigned Assistant United States Attorney, hereby files this Motion for a one-week extension of time to Comply with the Court's Order to File Redacted Copies of the Government's Pleadings in the Public Portion of the Court File [DE 150]. In support thereof, Respondent states:

1. On June 18, 2013, the Court entered an Order requiring the United States to file within 10 days redacted copies of its sealed pleadings in the public portion of the court file [DE 187].
2. Some of those pleadings have attached to them a Sealed Order entered by the Hon. Donald M. Middlebrooks. To avoid contravening the Orders of this Court and Judge Middlebrooks' Order, Respondent has determined that it must seek permission from Judge Middlebrooks to unseal or partially unseal his Order.
3. An additional seven (7) days is requested to prepare and receive a ruling on that motion. This request is not being interposed for purposes of delay, but rather to avoid the possibility of being found in violation of an order entered by another judge of this Court.

4. The undersigned has conferred with counsel for Petitioners, who have stated that they have no objection to the granting of this motion.

**Conclusion**

For the reasons set forth above, the United States respectfully requests that this Court grant an additional seven (7) days to comply with its Order requiring the filing of redacted pleadings in the public portion of the Court file.

Respectfully submitted,

WIFREDO A. FERRER  
UNITED STATES ATTORNEY

By: s/A. Marie Villafañá  
A. Marie Villafañá  
Assistant United States Attorney  
Florida Bar No. 0018255  
500 S. Australian Avenue, Suite 400  
West Palm Beach, FL 33401  
Tel: (561) 820-8711; Fax: (561) 820-8777  
Email: ann.marie.c.villafana@usdoj.gov

Dexter A. Lee  
Assistant United States Attorney  
Florida Bar No. 0936693  
99 N.E. 4th Street  
Miami, Florida 33132  
Tel: (305) 961-9320; Fax: (305) 530-7139  
Email: dexter.lee@usdoj.gov

Eduardo I. Sánchez  
Assistant United States Attorney  
Florida Bar No. 877875  
99 N.E. 4th Street  
Miami, Florida 33132  
Tel: (305) 961-9057; Fax: (305) 536-4676  
Email: eduardo.i.sanchez@usdoj.gov

Attorneys for Respondent

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via CM/ECF this 28th day of June, 2013, upon Counsel for Petitioners Jane Doe #1 and Jane Doe #2.

s/A. Marie Villafaña

A. Marie Villafaña

Assistant United States Attorney

**SERVICE LIST**

*Jane Does 1 and 2 v. United States,*  
Case No. 08-80736-CIV-MARRA/JOHNSON  
United States District Court, Southern District of Florida

Brad Edwards, Esq.,  
Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, P.L.  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301  
(954) 524-2820  
Fax: (954) 524-2822  
E-mail: brad@pathtojustice.com

Paul G. Cassell  
S.J. Quinney College of Law at the  
University of Utah  
332 S. 1400 E.  
Salt Lake City, Utah 84112  
(801) 585-5202  
Fax: (801) 585-6833  
E-mail: casselp@law.utah.edu

Attorneys for Jane Doe # 1 and Jane Doe # 2