

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-80804-CIV-MARRA/JOHNSON

JANE DOE, a/k/a
JANE DOE NO. 1,

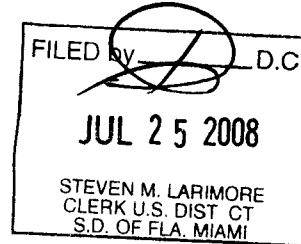
Plaintiff,

VS.

JEFFREY EPSTEIN, HALEY
ROBSON, and SARAH KELLEN,

Defendants.

sealed



FILED UNDER SEAL

DEFENDANTS JEFFREY EPSTEIN AND SARAH KELLEN'S
MOTION TO FILE UNDER SEAL

Lewis Tein PL.
ATTORNEYS AT LAW

3059 GRAND AVENUE, SUITE 340, COCONUT GROVE, FLORIDA 33133

ig. 2

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Pursuant to Rule 5.4 of the Local Rules of the United States District Court for the Southern District of Florida, defendants Jeffrey Epstein and Sarah Kellen hereby move to file their motion for stay, as well as this motion, under seal, stating as follows:

1. In their motion for stay, defendants Jeffrey Epstein and Sarah Kellen refer to a confidential agreement between the United States Attorney's Office for the Southern District of Florida and Jeffrey Epstein.

2. The information contained in the confidential agreement is material to this Court's consideration of the defendants' motion for stay.

3. To avoid disclosure of confidential material, the defendants request leave to file their motion for stay, and this motion, under seal.

4. We recognize that this Court has previously unsealed documents referring to this same agreement. We mean in no way to disregard that order, but seek merely to comply with the confidentiality clause in that agreement for this new and independent filing, in an abundance of caution, until directed otherwise by the Court.


5. The undersigned are authorized to represent that defendant Sarah Kellen joins in this motion.

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WHEREFORE, defendants Jeffrey Epstein and Sarah Kellen respectfully request leave to file this motion and their motion for stay, under seal.

Respectfully submitted,

LEWIS TEIN, P.L.
3059 Grand Avenue, Suite 340
Coconut Grove, Florida 33133
Tel: 305 442 1101
Fax: 305 442 6744

By: 
GUY A. LEWIS
Fla. Bar No. 623740
lewis@lewistein.com
MICHAEL R. TEIN
Fla. Bar No. 993522
tein@lewistein.com

ATTERBURY, GOLDBERGER & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
Tel. 561 659 8300
Fax. 561 835 8691

By: Jack A. Goldberger
Fla. Bar No. 262013
jgoldberger@agwpa.com

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

Undersigned counsel has conferred in good faith with counsel for the plaintiff, who opposes the relief requested in this motion.



Michael R. Tein

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document is being served this day, July 25, 2008, on counsel of record identified on the service list by U.S. Mail.



Michael R. Tein

Service List

Theodore J. Leopold, Esq.
Ricci-Leopold, P.A.
2925 PGA Blvd., Suite 200
Palm Beach Gardens, FL 33410
Fax: 561 697 2383
Counsel for Plaintiff Jane Doe

Douglas M. McIntosh, Esq.
Jason A. McGrath, Esq.
McIntosh, Sawran, Peltz & Cartaya, P.A.
Centurion Tower
1601 Forum Place, Suite 1110
West Palm Beach, Florida 33401
Fax. 561 682-3206
Counsel for Defendant Haley Robson

Bruce E. Reinhart, Esq.
Bruce E. Reinhart, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, Florida 33401
Fax. 561 828 0983
Counsel for Defendant Sarah Kellen

Robert D. Critton, Esq.
Michael J. Pike, Esq.
Burman, Critton, Luttier &
Coleman, LLP
515 N. Flagler Drive, Suite 400
West Palm Beach, Florida 33401
Fax. 561 515 3148
Co-Counsel for Jeffrey Epstein