

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2

CASE NO.: 08-CV-80119-MARRA/JOHNSON

Plaintiff,
vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,
vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80380-MARRA/JOHNSON

Plaintiff,
vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80381-MARRA/JOHNSON

Plaintiff,
vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 6

CASE NO.: 08-CV-80994-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

JANE DOE NO. 7

CASE NO.: 08-CV-80993-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

C.M.A.

CASE NO.: 08-CV-80811-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

JANE DOE

CASE NO.: 08-CV-80893-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

DOE II

CASE NO.: 09-CV-80469-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

JANE DOE NO. 101

CASE NO.: 09-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

JANE DOE NO. 102

CASE NO.: 09-CV-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

**PLAINTIFF'S NOTICE OF FILING WITHDRAWAL OF PREVIOUSLY RAISED
OBJECTIONS TO DEFENDANT, JEFFREY EPSTEIN'S, MOTION TO COMPEL
AND/OR IDENTIFY C.M.A. IN THE STYLE OF THIS CASE AND MOTION TO
IDENTIFY C.M.A. IN THIRD-PARTY SUBPOENAS FOR PURPOSES OF
DISCOVERY, OR, ALTERNATIVELY, MOTION TO DISMISS SUA SPONTE, WITH
INCORPORATED MEMORANDUM OF LAW**

Plaintiff, C.M.A., by and through her undersigned attorneys, hereby files notice of withdrawal of previously raised objections to Defendant, JEFRREY EPSTEIN'S, *Motion*

to Compel and/or Identify C.M.A. in the Style of This Case and Motion to Identify C.M.A. in Third-Party Subpoenas For Purposes of Discovery, or, Alternatively, Motion to Dismiss Sua Sponte, With Incorporated Memorandum of Law, and further states as follows:

1. Defendant, JEFFREY EPSTEIN, filed a *Motion to Compel and/or Identify C.M.A. in the Style of This Case and Motion to Identify C.M.A. in Third-Party Subpoenas For Purposes of Discovery, or, Alternatively, Motion to Dismiss Sua Sponte, With Incorporated Memorandum of Law* (D.E. 67) on April 29, 2009.

2. EPSTEIN's Motion seeks the following relief (taken verbatim from the conclusion of his Motion):

- a) "That C.M.A. be identified by her legal name in the style of this case;
- b) That Epstein be granted leave to identify C.M.A. by her legal name in Third-Party Subpoenas (but not file them in Court, or, if required, in a redacted form); and
- c) That on an alternative basis, this court dismiss this action Sua Sponte until such time as C.M.A. identifies herself in the style of this matter. Doe v. Rostker, 89 F.R.D at 163."

3. Plaintiff withdraws her objection to a) and b) requested above. The request to have C.M.A.'s case dismissed is rendered moot given C.M.A.'s acquiescence to a) and b). To the extent that it is not, however, C.M.A. continues to object to c) above.

4. Counsel for EPSTEIN is free to prepare a proposed agreed order reflecting the above for the Court's consideration following the undersigned's review of same.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

Counsel for the movant conferred via telephone with counsel for the Defendant regarding the filing of the instance Notice and he has no objection to Plaintiff filing same.

s/ Jack P. Hill

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of May, 2009, I electronically filed the foregoing with the Clerk of the Court by using CM/ECF system, which will send a notice of electronic filing to all counsel of record on the attached service list.

/s/Jack P. Hill _____
Jack Scarola
Florida Bar No.: 169440
Jack P. Hill
Florida Bar No.: 0547808
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9424
Attorneys for Plaintiff, C.M.A.

COUNSEL LIST

Richard H. Willits, Esquire
Richard H. Willits, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, FL 33461
Phone: (561) 582-7600
Fax: (561) 588-8819

Robert Critton, Esquire
Burman Critton Luttier & Coleman LLP
515 North Flagler Drive, Suite 400
West Palm Beach, FL 33414
Phone: (561) 842-2820
Fax: (561) 844-6929

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
West Palm Beach, FL 33401
Phone: (561) 863-9100

Bruce E. Reinhart, Esquire
Bruce E. Reinhart, P.A.
250 South Australian Avenue
Suite 1400
West Palm Beach, FL 33401
Phone: (561) 202-6360
Fax: (561) 828-0983