

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

**AMENDED JOINT MOTION FOR AN EXTENSION OF TIME
TO COMPLETE DISCOVERY DEADLINES AND SHORTEN EXPERT DISCLOSURES**

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 majority of the depositions of Plaintiffs have been taken but the majority have not been completed. A number of witness depositions have yet to occur. In fact, Defendant has over thirty (30) depositions that he believes are needed to complete discovery, dates for which Defendant's counsel requested from Plaintiffs' counsel on March 9, 2010. Plaintiffs

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counsel is working on the scheduling of these depositions. Additionally, the deposition of Jeffrey Epstein has not been completed, and Plaintiffs have additional depositions to take, some of which are out of state.

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 2-4** an additional two (2) weeks from April 12, 2010, making the new discovery cutoff date April 30, 2010 and extending the discovery cutoff in **Jane Does 5-7** to May 28, 2010.

6. Further, the current scheduling order requires expert reports to be disclosed on July 1, 2010. The parties have agreed to disclose the expert reports in **Jane Does 2-4** on May 14, 2010 and in **Jane Does 5-7** on June 7, 2010.

WHEREFORE, Plaintiffs and Defendant request that this Court enter an order granting the Motion for Extension of Time to Complete Discovery Deadline and Shorten Expert Disclosures.

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.

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By: /s/ Robert D. Critton
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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 March, 2010.

Respectfully submitted,

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