

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 UNOPPOSED MOTION FOR EXTENSION  
OF TIME IN WHICH TO RESPOND TO PLAINTIFF JANE DOE'S MOTIONS  
TO COMPEL RESPONSES TO REQUEST TO PRODUCE, ANSWERS TO  
REQUEST FOR ADMISSIONS, AND ANSWERS TO INTERROGATORIES**

Defendant, JEFFREY EPSTEIN, and Plaintiff, JANE DOE, by and through their undersigned counsel move this Court for an Extension of Time until September 18, 2009, to file Responses to Plaintiff Jane Doe's Motions to Compel Responses to Request to Produce, Answers to Request for Admissions, and Answers to Interrogatories, pursuant to Local Rule 7.1 A.1(j)(S.D. Fla. 2008). As good cause for the requested extension, Defendant states:

1. Brad Edwards, Counsel for the Plaintiff, was scheduled to return to the office after having a surgical procedure on Tuesday, September 8, 2009. However, Mr. Edwards will not return to his office in his full capacity until Monday, September 14, 2009.

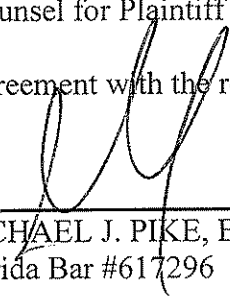
2. Mr. Edwards and the undersigned have agreed to review the above Motions in an effort to determine whether any of the issues therein are covered by the Court's Order on other 5<sup>th</sup> Amendment Privilege issues (DE 242).

3. The undersigned counsel has spoken with Mr. Edwards and each party has agreed to the extension of time until September 18, 2009.

4. While the undersigned lawyers are attempting to resolve certain issues in the above motions to conserve on judicial resources, no admissions are being made in this Motion and no arguments are being abandoned.

**Rule 7.1 A.3 Certification of Pre-Filing Conference**

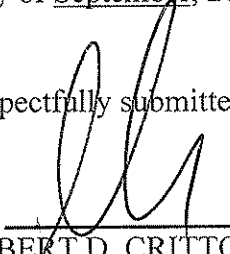
Counsel for Defendant conferred with Counsel for Plaintiff by telephone and/or electronic mail, and Counsel for Plaintiff is in agreement with the requested extension.

By:   
MICHAEL J. PIKE, ESQ.  
Florida Bar #617296

**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 10<sup>th</sup> day of September, 2009

Respectfully submitted,

By:   
ROBERT D. CRITTON, JR., ESQ.  
Florida Bar No. 224162  
[rcrit@bclclaw.com](mailto:rcrit@bclclaw.com)  
MICHAEL J. PIKE, ESQ.  
Florida Bar #617296  
[mpike@bclclaw.com](mailto:mpike@bclclaw.com)

BURMAN, CRITTON, LUTTIER &  
COLEMAN  
303 Banyan Blvd., Suite 400  
West Palm Beach, FL 33401  
561/842-2820 Phone  
561/515-3148 Fax  
(Counsel for Defendant Jeffrey Epstein)

**Certificate of Service**  
**Jane Doe No. 2 v. Jeffrey Epstein**  
**Case No. 08-CV-80119-MARRA/JOHNSON**

Stuart S. Mermelstein, Esq.  
Adam D. Horowitz, Esq.  
Mermelstein & Horowitz, P.A.  
18205 Biscayne Boulevard  
Suite 2218  
Miami, FL 33160  
305-931-2200  
Fax: 305-931-0877  
[ssm@sexabuseattorney.com](mailto:ssm@sexabuseattorney.com)  
[ahorowitz@sexabuseattorney.com](mailto:ahorowitz@sexabuseattorney.com)  
*Counsel for Plaintiffs*  
*In related Cases Nos. 08-80069, 08-80119,*  
*08-80232, 08-80380, 08-80381, 08-80993,*  
*08-80994*

Richard Horace Willits, Esq.  
Richard H. Willits, P.A.  
2290 10<sup>th</sup> Avenue North  
Suite 404  
Lake Worth, FL 33461  
561-582-7600  
Fax: 561-588-8819  
*Counsel for Plaintiff in Related Case No.*  
*08-80811*  
[reelrhwh@hotmail.com](mailto:reelrhwh@hotmail.com)

Jack Scarola, Esq.  
Jack P. Hill, Esq.  
Searcy Denney Scarola Barnhart & Shipley,

Brad Edwards, Esq.  
Rothstein Rosenfeldt Adler  
401 East Las Olas Boulevard  
Suite 1650  
Fort Lauderdale, FL 33301  
Phone: 954-522-3456  
Fax: 954-527-8663  
[bedwards@rra-law.com](mailto:bedwards@rra-law.com)  
*Counsel for Plaintiff in Related Case No.*  
*08-80893*

Paul G. Cassell, Esq.  
*Pro Hac Vice*  
332 South 1400 E, Room 101  
Salt Lake City, UT 84112  
801-585-5202  
801-585-6833 Fax  
[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)  
*Co-counsel for Plaintiff Jane Doe*

Isidro M. Garcia, Esq.  
Garcia Law Firm, P.A.  
224 Datura Street, Suite 900  
West Palm Beach, FL 33401  
561-832-7732  
561-832-7137 F  
[isidrogarcia@bellsouth.net](mailto:isidrogarcia@bellsouth.net)  
*Counsel for Plaintiff in Related Case No.*  
*08-80469*

P.A.

2139 Palm Beach Lakes Boulevard  
West Palm Beach, FL 33409  
561-686-6300  
Fax: 561-383-9424  
[jsx@searcylaw.com](mailto:jsx@searcylaw.com)  
[jph@searcylaw.com](mailto:jph@searcylaw.com)  
*Counsel for Plaintiff, C.M.A.*

Bruce Reinhart, Esq.  
Bruce E. Reinhart, P.A.  
250 S. Australian Avenue  
Suite 1400  
West Palm Beach, FL 33401  
561-202-6360  
Fax: 561-828-0983  
[ecf@brucereinhardt.com](mailto:ecf@brucereinhardt.com)  
*Counsel for Defendant Sarah Kellen*

Robert C. Josefsberg, Esq.  
Katherine W. Ezell, Esq.  
Podhurst Orseck, P.A.  
25 West Flagler Street, Suite 800  
Miami, FL 33130  
305 358-2800  
Fax: 305 358-2382  
[rjosefsberg@podhurst.com](mailto:rjosefsberg@podhurst.com)  
[kezell@podhurst.com](mailto:kezell@podhurst.com)  
*Counsel for Plaintiffs in Related Cases  
Nos. 09-80591 and 09-80656*

Jack Alan Goldberger, Esq.  
Atterbury Goldberger & Weiss, P.A.  
250 Australian Avenue South  
Suite 1400  
West Palm Beach, FL 33401-5012  
561-659-8300  
Fax: 561-835-8691  
[jagesq@bellsouth.net](mailto:jagesq@bellsouth.net)  
*Counsel for Defendant Jeffrey Epstein*