

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 3,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**DEFENDANT'S MOTION FOR EXTENSION OF TIME IN WHICH TO RESPOND
TO PLAINTIFF'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES
AND PRODUCTION OF DOCUMENTS**

Defendant, Jeffrey Epstein, (hereinafter "Epstein") by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to respond to Plaintiff's Motion to Compel Answers to Interrogatories And Production of Documents, dated March 2, 2009. Local General Rule 7.1 A.1 and Rule 6, Fed. R. Civ. P. (2009). Defendant seeks an extension until March 25, 2009, to file his response. As good cause in support of granting the motion, Defendant states:

1. Defendant's response to the motion to compel would be due on March 16, 2009 (10 days to respond, not including weekends). As certified below, Plaintiff's counsel is in agreement with the requested extension of March 25, 2009.

2. Plaintiff's counsel also represents other Plaintiffs pursuing claims against Defendant, EPSTEIN. A total of four of the Plaintiffs have also filed motions to compel bearing the same dates. In order to fully and adequately respond to this and the other motions, Defendant is in need of an extension until March 25, 2009.

Jane Doe No. 3 v. Epstein
Page 2

3. In addition to the multiple motions to compel, good cause for the extension also includes that counsel has been attempting to resolve discovery issues in this and other cases against Defendant, EPSTEIN; an associate of Defendant's undersigned counsel who works extensively on this case was out of the office for two weeks during the month February caring for two of her children who had the flu, and the associate herself also caught the flu; Defendant's counsel is also in the midst of preparing for two state court trials – one on a March trial docket and the other specially set in mid-May, (OLD MARSH GOLF CLUB, INC. v. OLD MARSH PARTNERS, et al, Case No. 50 2006CA001667XXXXMBAD – set on trial docket beginning March 16, 2009; CARDIOPULMONARY & PRIMARY CARE ASSOC. OF TREASURE COAST, P.A v. LEWIS, M.D., Case No. 562008CA001726, specially set for trial beginning May 13 through 15, 2009). Discovery in both of these cases is ongoing with several depositions set to prepare for trial.

4. The requested extension is fair in reasonable under the circumstances as it will provide time to allow the Defendant, EPSTEIN, to fully and adequately respond to this and the other motions to compel.

WHEREFORE, Defendant requests that this Court enter an order granting the Defendant an extension until March 25, 2009, in which to respond to Plaintiff's Motion to Compel Answers to Interrogatories and Production of documents.

Local Rule 7.1 Certification

Counsel for the movant conferred by telephone with counsel for the Plaintiff and Counsel for Plaintiff is in agreement with the requested extension until March 25, 2009

Jane Doe No. 3 v. Epstein
Page 3

for Defendant to respond to the motion to compel.



Robert D. Critton, Jr.
Attorney for Defendant Epstein

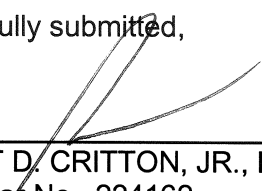
Certificate of Service

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 6th day of March, 2009:

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
ahorowitz@sexabuseattorney.com
Counsel for Plaintiff Jane Doe #3

Jack Alan Goldberger
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
Co-Counsel for Defendant Jeffrey Epstein

Respectfully submitted,


By: _____
ROBERT D. CRITTON, JR., ESQ.
Florida Bar No. 224162
rcrit@bclclaw.com
MICHAEL J. PIKE, ESQ.
Florida Bar #617296
mpike@bclclaw.com
BURMAN, CRITTON, LUTTIER & COLEMAN
515 N. Flagler Drive, Suite 400
West Palm Beach, FL 33401
561/842-2820 Phone
561/515-3148 Fax
(Co-Counsel for Defendant Jeffrey Epstein)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 3,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**ORDER ON DEFENDANT'S MOTION FOR EXTENSION OF TIME IN WHICH TO
RESPOND TO PLAINTIFF'S MOTION TO COMPEL ANSWERS TO
INTERROGATORIES AND PRODUCTION OF DOCUMENTS**

This matter came before the Court on Defendant's, JEFFREY EPSTEIN, Motion For Extension of Time in Which to Respond to Plaintiff's Motion to Compel Answers to Interrogatories and Production of Documents. Having considered Defendant's motion and Plaintiff's counsel being in agreement with the requested extension, it is HEREBY ORDERED and ADJUDGED that:

Defendant's motion is GRANTED. Defendant shall respond to Plaintiff's Motion to Compel Answers to Interrogatories and Production of Documents on or before March 25, 2009.

DONE and ORDERED this ____ day of _____, 2009.

Kenneth A. Marra
United States District Judge

Courtesy Copies: Counsel of Record