

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, et al.,

Defendant.

/

DOE II,

CASE NO.: 08-CV- 80469-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN et al.,

Defendant.

JANE DOE NO. 101,

CASE NO.: 08- CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 102,

CASE NO.: 08- CV-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

**PLAINTIFFS' JANE DOES 2-7 MOTION FOR ENLARGEMENT
OF TIME TO RESPOND TO DEFENDANT'S MOTION TO COMPEL
AND/OR IDENTIFY JANE DOE IN THE STYLE ET AL.**

Plaintiffs, JANE DOES 2-7, by and through their undersigned counsel, hereby file this Motion for Enlargement of Time to Respond to Defendant's Motion to Compel and/or Identify Jane Doe in the Style of this Case and Motion to Identify Jane Doe in Third Party Subpoenas for Purposes of Discovery, or Alternatively Motion to Dismiss Sua Sponte, and state as follows:

1. Defendant Epstein filed his Motion to Compel and/or Identify Jane Doe in the Style, *et al.*, in the cases brought by Jane Does No. 2-7 ("Does 2-7") on May 5 and 6, 2009. Under S.D.Fla.L.R. 7.1(C), Does No. 2-7' response is due on May 22, 2009.
2. Plaintiffs request an additional twenty (20) days to respond to the Motion to

Compel and/or Identify Jane Doe in the Style, *et al.* This request for enlargement of time of twenty (20) days is necessitated primarily by Plaintiffs desire to have the psychiatric expert who examined the Plaintiffs consider the issue of their public identification and, if appropriate, submit an expert declaration in response to the relief sought in the Defendant's Motion. The enlargement of time requested is sought to provide the expert with adequate time to perform this work.

3. Additionally, Plaintiffs' counsel has conflicts with other cases and matters which necessitate additional time for a response, including, without limitation, a special set hearing and upcoming trial in John Doe 6 v. Diocese of Orlando, case no. 48-2005-010138-0, Ninth Judicial Circuit for Orange County, Florida; and an upcoming deadline to file Appellant's initial Brief in Jane Doe v. Florida International University Board of Trustees, case no. 3D09-414, Florida Third District Court of Appeals.

4. Plaintiffs' counsel has conferred with Defendant's counsel, Robert Critton and Michael Pike, regarding this request for extension of time. While Defendant's counsel represented that Defendant would consent to an extension of time of one (1) week, until May 29, 2009, Defendant opposes any further extension of time. The grounds stated by Defendant's counsel for opposing the extension of time requested concern the relief sought in Defendant's Motion to Strike Cases from the Current Trial Docket, filed on May 19, 2009.

WHEREFORE, Plaintiffs Jane Doe Nos. 2-7 respectfully request an enlargement of time until June 11, 2009 to file their response to Defendant's Motion to Compel and/or Identify Jane Doe in the Style, *et al.*, and for such other and further relief this Court deems just and proper.

Dated: May 21, 2009

Respectfully submitted,

By: s/ Stuart S. Mermelstein
Stuart S. Mermelstein (FL Bar No. 947245)

ssm@sexabuseattorney.com
Adam D. Horowitz (FL Bar No. 376980)
ahorowitz@sexabuseattorney.com
MERMELSTEIN & HOROWITZ, P.A.
Attorneys for Plaintiffs
18205 Biscayne Blvd., Suite 2218
Miami, Florida 33160
Tel: (305) 931-2200
Fax: (305) 931-0877

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day to all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Stuart S. Mermelstein .

SERVICE LIST
DOE vs. JEFFREY EPSTEIN
United States District Court, Southern District of Florida

Jack Alan Goldberger, Esq.
jgoldberger@agwpa.com

Robert D. Critton, Esq.
rcritton@bclclaw.com

/s/ Stuart S. Mermelstein