

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

_____ /

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO FILE REPLY
TO PLAINTIFF, JANE DOE'S, RESPONSE IN OPPOSITION TO DEFENDANT'S
MOTION FOR RECONSIDERATION AND/OR REQUEST FOR
RULE 4 REVIEW AND APPEAL (485)**

Defendant, Jeffrey Epstein, (hereinafter "Epstein") by and through his undersigned attorneys, respectfully moves this Court for an Extension of Time in which to Reply to Plaintiff, Jane Doe's, Response in Opposition to Defendant's Motion for Reconsideration and/or Request for Rule 4 Review and Appeal. Defendant seeks an additional four (4) day extension until March 26, 2010 to file his Reply. As good cause in support of granting the motion, Defendant states:

1. On February 4, 2010 this Court entered an Omnibus Order granting in part and denying in part Plaintiff's Motions to Compel Responses to Requests for Production (DE 462).

2. On February 26, 2010 Defendant filed his Motion for Reconsideration and/or Request for Rule 4 Review and Appeal (DE 477).

3. On March 10, 2010 Plaintiff filed her Response in Opposition to Defendant's Motion for Reconsideration and/or Request for Rule 4 Review and Appeal (DE 485).

4. Defendant's Reply to Plaintiff's Response in Opposition is currently due on March 22, 2010.

5. Robert D. Critton, counsel for the Defendant, is currently out of town and Michael J. Pike, counsel for the Defendant, has attended three (3) depositions in related matters this week and therefore needs a simple four (4) days extension to file Defendant's Reply.


6. While this request is reasonable, counsel for the Defendant has spoken to counsel for the Plaintiff and he is not in agreement with the requested four (4) day extension.

Wherefore, the undersigned respectfully requests the relief sought herein, and for such other and further relief as this court deems just and proper.

Local Rule 7.1 Statement

Counsel for the movant conferred by e-mail with counsel for the Plaintiff and Counsel for Plaintiff is not in agreement with the requested extension.


By: /s/ Michael J. Pike
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Certificate of Service

I HEREBY 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 electronic mail (e-mail) on this 18th day of March, 2010.

Respectfully submitted,


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

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