

**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 MOTION FOR AN EXTENSION OF TIME
TO COMPLETE DISCOVERY DEADLINES AS TO
JANE DOE (08-80893)**

Defendant, JEFFREY EPSTEIN, by and through his undersigned attorneys, and Plaintiff, JANE DOE, by and through her undersigned attorney 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. This case is currently set on a two week trial docket commencing on July 19, 2010.
2. The majority of the depositions have been completed, however, a number of witness depositions have yet to occur, including expert witnesses.
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

Jane Doe v. Epstein, et al.
Page 2

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.

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

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.

By: /s/ Robert D. Critton
ROBERT D. CRITTON, ESQ.
Florida Bar # 224162
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 23rd day of April, 2010.

Respectfully submitted,

By: /s/ Robert D. Critton
ROBERT D. CRITTON, JR., ESQ.
Florida Bar No. 224162
rcrit@bclclaw.com

Jane Doe v. Epstein, et al.
Page 3

MICHAEL J. PIKE, ESQ.
Florida Bar #617296
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
ahorowitz@sexabuseattorney.com
Counsel for Plaintiffs
In related Cases Nos. 08-80069, 08-80119, 08-80232, 08-80380, 08-80381, 08-80993, 08-80994

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
561-659-8300

Brad Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL
425 N. Andrews Avenue
Suite 2
Fort Lauderdale, FL 33301
Phone: 954-524-2820
Fax: 954-524-2822
brad@pathtojustice.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
Co-counsel for Plaintiff Jane Doe

Jane Doe v. Epstein, et al.

Page 4

Fax: 561-835-8691

jagesq@bellsouth.net

Counsel for Defendant Jeffrey Epstein

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

kezell@podhurst.com

Counsel for Plaintiffs in Related Cases Nos.

09-80591 and 09-80656

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

Counsel for Plaintiff in Related Case No. 08-

80469