

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

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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,

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