

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 9:08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES

/

**JANE DOE NO. 1 AND JANE DOE NO. 2'S UNOPPOSED MOTION TO SEAL THEIR
PETITION FOR WRIT OF HABEAS CORPUS AD TESTIFICANDUM**

COME NOW Jane Doe No. 1 and Jane Doe No. 2 (the "victims"), by and through undersigned counsel, to file this motion seal their Petition for Writ of Habeas Corpus Ad Testificandum. The petition contains information that could be used to identify Jane Doe 1, who has been proceeding in this matter under the pseudonym. In addition, the petition contains information that could be used to determine the location of Jane Doe 1. As the Court is aware, this case involves allegations contains sexual abuse by sex trafficking organization, who might have reason to intimidate or threaten Jane Doe 1. In light of these circumstances, Jane Doe 1 requests that that her petition (along with the accompanying proposed order) be placed under seal. The United States does not oppose this motion to file under seal.

WHEREFORE, the victims request that their Petition for Writ of Habeas Corpus Ad Testificandum be placed under seal.

DATED: April 19, 2016

Respectfully Submitted,

/s/ Bradley J. Edwards
Bradley J. Edwards

FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Telephone (954) 524-2820
Facsimile (954) 524-2822
E-mail: brad@pathtojustice.com

And

Paul G. Cassell
Pro Hac Vice
S.J. Quinney College of Law at the
University of Utah*
332 S. 1400 E.
Salt Lake City, UT 84112
Telephone:801-585-5202
Facsimile:801-585-6833
E-Mail:casselllp@law.utah.edu

Attorneys for Jane Does No. 1, 2, 3 and 4

*This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on April 19, 2016, on the following using the Court's CM/ECF system or, for non-parties, by separate email service:

Dexter Lee
A. Marie Villafaña
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401
(561) 820-8711
Fax: (561) 820-8777
E-mail: Dexter.Lee@usdoj.gov
E-mail: ann.marie.c.villafana@usdoj.gov

Attorneys for the Government

Roy Eric Black
Jacqueline Perczek
Black Srebnick Kornspan & Stumpf
201 S Biscayne Boulevard
Suite 1300
Miami, FL 33131
305-371-6421
Fax: 358-2006
Email: pleading@royblack.com

Attorneys for Jeffrey Epstein

Kendall Coffey, Fla. Bar No. 259681
kcoffey@coffeyburlington.com
Gabriel Groisman, Fla. Bar No. 25644
ggroisman@coffeyburlington.com
Benjamin H. Brodsky, Fla. Bar No. 73748
bbrodsky@coffeyburlington.com
COFFEY BURLINGTON, P.L.
2601 South Bayshore Drive, PH1
Miami, Florida 33133
Telephone: (305) 858-2900
Facsimile: (305) 858-5261

Thomas E. Scott , Jr.
Cole Scott & Kissane

Dadeland Centre II Suite 1400
9150 S Dadeland Boulevard
Miami, FL 33156
305-350-5381
Fax: 305-373-2294
Email: thomas.scott@csklegal.com

Attorneys for Alan Dershowitz

/s/ Bradley J. Edwards