

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO. 50-2019-CA-014681-XXXX-MB
Division: AG

CA FLORIDA HOLDINGS, LLC)
Publisher of THE PALM BEACH POST,)
Plaintiff,)
v.)
DAVE ARONBERG, as State Attorney of)
Palm Beach County, Florida, SHARON R.)
BOCK, as Clerk and Comptroller of Palm)
Beach County, Florida,)
Defendants.)

**PLAINTIFF'S UNOPPOSED
MOTION TO CONTINUE HEARING
SCHEDULED FOR MARCH 24, 2020**

Plaintiff, CA FLORIDA HOLDINGS, LLC., Publisher of the Palm Beach Post (the “Plaintiff” or “Post”) files this Unopposed Motion to Continue Hearing Scheduled for March 24, 2020 and states:

1. Plaintiff publishes a newspaper known as the Palm Beach Post. It has filed this Declaratory Judgment action to seek access, on behalf of the public, to the grand jury evidence in former Palm Beach County State Attorney Barry Krischer’s prosecution of the late Jeffrey Epstein.
2. Both defendants have moved to dismiss Count II of the Amended Complaint, and this Court set a hearing in court for March 24, 2020 at 10:00 a.m.
3. Due to the current national health emergency, the Post requests that the hearing be continued.
4. The Post understands that the Court may not be in session on March 24, 2020 as it has been reported that the Court is in a voluntary 14 day quarantine due to a recent foreign trip.

5. Further, the Post's lead counsel, Nina Boyajian, resides in California, and travel to Florida to orally argue against the motions to dismiss poses a health risk to her.

6. The Post believes that conducting the hearing via tele-conference will be problematic, and that the hearing should be continued *sine die* until such time as the Court deems it appropriate.

7. None of the parties will be prejudiced by a continuance.

8. The Post has reached out to defendants' counsel and they agree to a continuance.

WHEREFORE, Plaintiff respectfully requests that the hearing on Defendants' motions to dismiss Count II of the Amended Complaint, currently scheduled for March 24, 2020 at 10:00 a.m., be continued *sine die*, and that when appropriate the matter should be rescheduled for oral argument, and the Court should grant such other relief it deems just and proper.

Dated: March 18, 2020

Respectfully submitted,

GREENBERG TRAURIG, P.A.
*Attorneys for CA Florida Holdings, LLC,
Publisher of The Palm Beach Post*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of March 2020, a copy of the foregoing has been electronically filed with the Florida E-File Portal for e-service on all parties of record herein.

/s/ Stephen A. Mendelsohn
STEPHEN A. MENDELSON