

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

CASE NO.: 08-CV-80119-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

JANE DOE NO. 3,

CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

JANE DOE NO. 4,

CASE NO.: 08-CV-80380-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

JANE DOE NO. 5,

CASE NO.: 08-CV-80381-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

/

**PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO RESPOND TO DEFENDANT'S MOTIONS TO
DISMISS AND FOR MORE DEFINITE STATEMENT**

Plaintiffs, Jane Doe 2, Jane Doe 3, Jane Doe 4 and Jane Doe 5, by and through undersigned counsel, file this Motion for Enlargement of Time to Respond to Defendant's Motions to Dismiss and for More Definite Statement, and state as follows:

1. Defendant Jeffrey Epstein filed a similar Motion to Dismiss and Motion for More Definite Statement (the "Motions to Dismiss") in each of the above-captioned cases, on October 6, 2008. Plaintiffs' response to the Motions to Dismiss under Local Rule 7.1 is presently due on October 24, 2008.

2. Plaintiffs seek an enlargement of time of five (5) business days, until October 31, 2008, to file their response to the Motions to Dismiss. This enlargement of time will synchronize the response date to the Motions to Dismiss in the above-captioned cases with the response date to the similar Motions to Dismiss filed in Jane Doe Nos. 6-7 v. Epstein, case nos. 08-80994-CIV-Marra and 08- 80993-CIV-Marra, which is October 31, 2008.

3. Additionally, this request for enlargement of time is necessitated by Plaintiffs' counsel's prior commitments and the demands of other cases and matters, including upcoming discovery cutoffs in Jane Doe v. School Board of Broward County and Scavella, case no. 07-21367-CIV-SEITZ, U.S. District Court, Southern District Court of Florida, and Doe v. Faerber, case no. 05-CV-142-FTM-33DNF, U.S. District Court, Middle District of Florida.

4. This Motion seeks a brief enlargement of time and is not brought for purposes of delay.

5. Plaintiff has conferred with Defendant's counsel, Robert Critton, regarding this request for enlargement of time, and he has no objection to this request.

WHEREFORE, Plaintiff respectfully requests an Order granting an enlargement of time of five (5) business days, until October 31, 2008, to file the Plaintiffs' response to the Motions to Dismiss.

Dated: October 24, 2008.

Respectfully submitted,

By: _____ s/ Jeffrey M. Herman

Jeffrey M. Herman (FL Bar No. 521647)

jherman@hermanlaw.com

Stuart S. Mermelstein (FL Bar No. 947245)

ssm@hermanlaw.com

Adam D. Horowitz (FL Bar No. 376980)

ahorowitz@hermanlaw.com

HERMAN & MERMELSTEIN, P.A.

Attorneys for Plaintiffs Jane Doe

18205 Biscayne Blvd., Suite 2218

Miami, Florida 33160

Tel: 305-931-2200

Fax: 305-931-0877

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2008, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day to all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically Notices of Electronic Filing.

_____ s/ Jeffrey M. Herman

SERVICE LIST
DOE vs. JEFFREY EPSTEIN
United States District Court, Southern District of Florida

Jack Alan Goldberger, Esq.
jgoldberger@agwpa.com

Michael R. Tein, Esq.
tein@lewistein.com

Robert D. Critton, Esq.
rcritton@bclclaw.com

Michael Pike, Esq.
mpike@bclclaw.com

s/ Jeffrey M. Herman