

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.
_____ /

JANE DOE NO. 6

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80994-MARRA/JOHNSON

JANE DOE NO. 7

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80993-MARRA/JOHNSON

C.M.A.

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80811-MARRA/JOHNSON

JANE DOE

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80893-MARRA/JOHNSON

DOE II

CASE NO.: 09-CV-80469-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE NO. 101

CASE NO.: 09-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE NO. 102

CASE NO.: 09-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME IN WHICH TO FILE A RESPONSE
TO DEFENDANT'S MOTION TO IDENTIFY C.M.A. IN THIRD-PARTY SUBPOENAS
FOR PURPOSES OF DISCOVERY, OR ALTERNATIVELY, MOTION TO DISMISS
SUA SPONTE, WITH INCORPORATED MEMORANDUM OF LAW**

Plaintiff, C.M.A., by and through her undersigned attorneys, respectfully moves this Court for an extension of time in which file to a response to Defendant Jeffrey Epstein's Motion to Identify C.M.A. in Third Party Subpoenas For Purposes of Discovery, or Alternatively, Motion to Dismiss Sua Sponte, With Incorporated

Memorandum of Law. Local General Rule 7.1 A.1 and Rule 6, Fed. R. Civ. P. (2009). Plaintiff seeks an extension until May 25, 2009, to file her response. As good cause in support of granting the motion, Plaintiff states:

1. Defendant's Motion to Identify C.M.A was electronically filed and dated April 29, 2009. Pursuant to Rule 15(3), Fed.R.Civ.P., Plaintiff's response would be due on May 18, 2009.

2. Defendant's counsel is in agreement with the requested extension until May 25, 2009, for Plaintiff to file a response to Defendant's Motion to Identify C.M.A.

3. Defendant's motion seeks to publicly identify C.M.A, a victim of Defendant's sexual abuse.

4. The undersigned has been busy researching and drafting responsive memorandums in opposition to dispositive motions for summary judgment in a pending state court wrongful death case which are set for hearing next week.

5. The requested extension is fair and reasonable under the circumstances as it will provide time to allow Plaintiff, C.M.A., to fully and adequately prepare a response to Defendant's motion.

WHEREFORE, Plaintiff, C.M.A., requests that this Court enter an order granting Plaintiff an extension until May 25, 2009, to file a response to Defendant Jeffrey Epstein's Motion to Identify C.M.A. in Third Party Subpoenas For Purposes of Discovery, or Alternatively, Motion to Dismiss Sua Sponte, With Incorporated Memorandum of Law.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

Counsel for the movant conferred in person with counsel for the Defendant and counsel for the Defendant is in agreement with requested extension until May 25, 2009, for Plaintiff to file a response to Defendant Jeffrey Epstein's Motion to Identify C.M.A. in Third Party Subpoenas For Purposes of Discovery, or Alternatively, Motion to Dismiss Sua Sponte, With Incorporated Memorandum of Law.

s/ Jack P. Hill

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of May, 2009, I electronically filed the foregoing with the Clerk of the Court by using CM/ECF system, which will send a notice of electronic filing to all counsel of record on the attached service list.

/s/Jack P. Hill

Jack Scarola

Florida Bar No.: 169440

Jack P. Hill

Florida Bar No.: 0547808

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Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.
_____ /

JANE DOE NO. 102

CASE NO.: 09-CV-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.
_____ /

**AGREED ORDER ON PLAINTIFF'S MOTION FOR EXTENSION OF TIME IN WHICH
TO FILE A RESPONSE TO DEFENDANT JEFFREY EPSTEIN'S MOTION TO
IDENTIFY C.M.A. IN THIRD-PARTY SUBPOENAS FOR PURPOSES OF
DISCOVERY, OR ALTERNATIVELY, MOTION TO DISMISS SUA SPONTE, WITH
INCORPORATED MEMORANDUM OF LAW**

This matter came before the Court upon the Plaintiff's Motion for Extension of Time in Which to File a Response to Defendant Jeffrey Epstein's Motion to Identify C.M.A. in Third Party Subpoenas For Purposes of Discovery, or Alternatively, Motion to Dismiss Sua Sponte, With Incorporated Memorandum of Law. Having considered the

motion and the agreement with the requested extension, it is hereby ORDERED and ADJUDGED that:

Plaintiff's motion is hereby granted. Plaintiff has until May 25, 2009, to file a response to Defendant Jeffrey Epstein's Motion to Identify C.M.A. in Third Party Subpoenas For Purposes of Discovery, or Alternatively, Motion to Dismiss Sua Sponte, With Incorporated Memorandum of Law.

DONE AND ORDERED this _____ day of _____, 2009.

KENNETH A. MARRA
United States District Judge

Copies to all Counsel of Record