

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,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 7,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

C.M.A.,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. II,

CASE NO.: 08-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-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

MOTION TO RESCHEDULE HEARING

COMES NOW Robert C. Josefsberg, as co-counsel for Jane Doe 101 and 102, and respectfully requests either a rescheduling of this Court's hearing (just rescheduled for June, 12, 2009) or in the alternative, permission to appear by telephone at said hearing, on the following grounds:

1) On Wednesday, June 10, 2009, undersigned counsel, his wife and two granddaughters will be traveling to Hanover, New Hampshire for counsel's 50th College Reunion, and an opportunity for his two high school granddaughters to visit colleges in the Northeast. Counsel is scheduled to return to South Florida on Tuesday, June 16th.

2) Counsel is very appreciative and supportive of the Court's scheduling a hearing on the Defendants' Motion to Stay. That hearing was scheduled (within the last 3 hours) for Friday, June 12th at 10:00 a.m. , right in the middle of Robert Josefsberg's reunion visit.

3) If Robert Josefsberg cannot attend, Jane Doe 101 and 102 will be well represented by co-counsel who can and will appear in person at said hearing on June 12, 2009. However, Robert Josefsberg is lead counsel and would prefer to be present during said hearing.

4) In the event that this hearing cannot be rescheduled for June 4, 5, 8 or 9th, or June 17th , 18th or 19th, Robert Josefsberg requests permission to appear at said June 12th hearing by telephone.

WHEREFORE, Robert Josefsberg requests the relief requested above.

Dated May 29, 2009.

Respectfully submitted,

PODHURST ORSECK, P.A.
Attorneys for Plaintiffs Jane Doe No. 101
and Jane Doe No. 102

By: s/ Robert C. Josefsberg
Robert C. Josefsberg
Fla. Br No. 040856
rjosefsberg@podhurst.com

Katherine W. Ezell
Fla. Bar No. 114771
kezell@podhurst.com
City National Bank Building
25 W. Flagler Street, Suite 800
Miami, FL 33130
Telephone: (305) 358-2800
Facsimile: (305) 358-2382

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this _____ day of May, 2009, we electronically filed the foregoing document with the Clerk of the Court using CM/ECF. We also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

Respectfully submitted,

PODHURST ORSECK, P.A.
Attorneys for Plaintiffs Jane Doe No. 101
and Jane Doe No. 102

By: s/Katherine W. Ezell
Robert C. Josefsberg
Fla. Br No. 040856
rjosefsberg@podhurst.com
Katherine W. Ezell
Fla. Bar No. 114771
kezell@podhurst.com
City National Bank Building
25 W. Flagler Street, Suite 800
Miami, FL 33130
Telephone: (305) 358-2800
Facsimile: (305) 358-2382

SERVICE LIST

JANE DOE NO. 2 v. JEFFREY EPSTEIN
Case No. 08-CV-80119-MARRA/JOHNSON
United States District Court, Southern District of Florida

Robert Critton, Esq.
Michael J. Pike, Esq.
Burman, Critton, Luttier & Coleman LLP
515 North Flagler Drive, Suite 400
West Palm Beach, FL 33401
Phone: (561) 842-2820
Fax: (561) 515-3148
rcrit@bclclaw.com
mpike@bclclaw.com
Counsel for Defendant, Jeffrey Epstein

Jack Goldberger, Esq.
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
Phone: (561) 659-8300
Fax: (561) 835-8691
jagesq@bellsouth.net
Co-Counsel for Defendant, Jeffrey Epstein

Bruce E. Reinhart, Esq.
Bruce E. Reinhart, P.A.
250 South Australian Avenue, Suite 1400
West Palm Beach, FL 33401
Phone: (561) 202-6360
Fax: (561) 828-0983
ecf@brucereinhardtlaw.com
Counsel for Co-Defendant, Sarah Kellen

Jack Scarola, Esq.
Jack P. Hill, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9456
jsx@searcylaw.com
jph@searcylaw.com
Counsel for Plaintiff C.M.A.

Adam Horowitz, Esq.
Stuart Mermelstein, Esq.
Mermelstein & Horowitz, P.A.
18205 Biscayne Blvd., Suite 2218
Miami, FL 33160
Phone: (305) 931-2200
Fax: (305) 931-0877

ahorowitz@sexabuseattorney.com

smermelstein@sexabuseattorney.com

Counsel for Plaintiffs in Related Cases Nos. 08-80069, 08-80119, 08-80232, 08-80380, 08-80381, 08-80993, 08-80994

Spencer Todd Kuvin, Esq.
Theodore Jon Leopold, Esq.
Leopold Kuvin, P.A.
2925 PGA Boulevard, Suite 200
Palm Beach Gardens, FL 33410
Phone: (561) 515-1400
Fax: (561) 515-1401

skuvin@leopoldkuvin.com

tleopold@leopoldkuvin.com

Counsel for Plaintiff in Related Case No. 08-08804

Richard Willits, Esq.
Richard H. Willits, P.A.
2290 10th Ave North, Suite 404
Lake Worth, FL 33461
Phone: (561) 582-7600
Fax: (561) 588-8819

lawyerwillits@aol.com

reelrhw@hotmail.com

Counsel for Plaintiff in Related Case No. 08-80811

Brad Edwards, Esq.
Law Office of Brad Edwards & Associates, LLC
2028 Harrison Street, Suite 202
Hollywood, FL 33020
Phone: (954) 414-8033
Fax: (954) 924-1530

bedwards@rra-law.com

be@bradedwardslaw.com

Counsel for Plaintiff in Related Case No. 08-80893

Isidro Manuel Garcia, Esq.
Garcia Elkins & Boehringer
224 Datura Avenue, Suite 900

West Palm Beach, FL 33401

Phone: (561) 832-8033

Fax: (561) 832-7137

isidrogarcia@bellsouth.net

Counsel for Plaintiff in Related Case No. 08-80469