

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 4,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**Defendant's Amended Motion For Extension Of Time In Which To Respond To
Plaintiff's Motion For Protective Against Piecemeal Depositions Of Jane Doe.
No.4, Motion To Consolidate Cases For Purposes Of Discovery And Incorporated
Memorandum Of Law**

Defendant, Jeffrey Epstein, (hereinafter "Epstein") by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to respond to Plaintiff's Motion For Protective Against Piecemeal Depositions Of Jane Doe. No.4, Motion To Consolidate Cases For Purposes Of Discovery And Incorporated Memorandum Of Law("Motion"). Local General Rule 7.1 A.1 and Rule 6, Fed. R. Civ. P. (2009). Defendant seeks an extension until April 24, 2009 to file his response. As good cause in support of granting the motion, Defendant states:

1. Defendant's response to the Motion is due on or about April 6, 2009, and an extension was given to April 13, 2009.

2. Plaintiff's counsel also represents five (5) other Plaintiffs pursuing claims against Defendant, EPSTEIN, most of which have filed similar Motions. In order to fully and adequately respond to this and the other motions, Defendant is in need of an extension until April 24, 2009.

Jane Doe No. 4 v. Epstein
Page 2

3. In addition to the multiple motions, good cause for the extension also includes that counsel has been attempting to resolve discovery issues in this and other cases against Defendant, EPSTEIN; an associate of Defendant's undersigned counsel who works extensively on this case is currently out of the office and the undersigned was working on and has filed between 12-15 motions and responses in the various cases during the time these motions were filed.

4. The requested extension is fair and reasonable under the circumstances as it will provide time to allow the Defendant, EPSTEIN, to fully and adequately respond to this and the other motions. In addition, this action is still at its early stages.

5. As certified below, counsel for Defendant conferred with counsel for Plaintiff, and Plaintiff's counsel is in agreement with the requested extension.

WHEREFORE, Defendant requests that this Court enter an order granting an Defendant an extension until April 24, 2009, in which to respond to the Above Motion.

Local Rule 7.1 Statement

Counsel for the movant conferred by telephone with counsel for the Plaintiff and Counsel for Plaintiff is in agreement with the requested extension until April 24, 2009 for Defendant to respond to the Motion.

By: 
ROBERT D. CRITTON, JR., ESQ.

Jane Doe No. 4 v. Epstein
Page 3

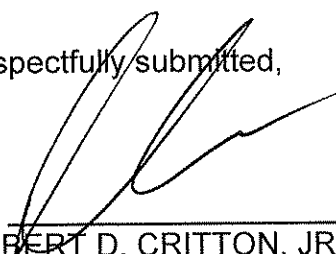
Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following Service List in the manner specified by CM/ECF on this 16 day of April, 2009:

Stuart S. Mermelstein, Esq.
Adam D. Horowitz, Esq.
Mermelstein & Horowitz, P.A.
18205 Biscayne Boulevard
Suite 2218
Miami, FL 33160
305-931-2200
Fax: 305-931-0877
ssm@sexabuseattorney.com
ahorowitz@sexabuseattorney.com
Counsel for Plaintiff Jane Doe #4

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
561-659-8300
Fax: 561-835-8691
jagesq@bellsouth.net
Co-Counsel for Defendant Jeffrey Epstein

Respectfully submitted,

By: 
ROBERT D. CRITTON, JR., ESQ.
Florida Bar No. 224162
rcrit@bclclaw.com
MICHAEL J. PIKE, ESQ.
Florida Bar #617296
mpike@bclclaw.com
BURMAN, CRITTON, LUTTIER & COLEMAN
515 N. Flagler Drive, Suite 400
West Palm Beach, FL 33401
561/842-2820 Phone
561/515-3148 Fax
(Co-Counsel for Defendant Jeffrey Epstein)