

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 3,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

/

**DEFENDANT EPSTEIN'S MOTION FOR EXTENSION OF TIME IN WHICH TO FILE REPLY
TO PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION TO STAY**

Defendant, Jeffrey Epstein, (hereinafter "Epstein") by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to file his Reply to Plaintiff's Response in Opposition to Defendant's Motion to Stay Complaint.

1. On April 23, 2009 Plaintiff filed a Response [DE 74] in Opposition to Defendant's Motion to Stay [DE 57]. Defendant's reply would be due on May 5, 2009 (5 days to reply excluding weekends + mailing). Defendant is requesting a fifteen (15) day extension to May 20, 2009 to reply.
2. There are several other cases filed with this Court in which Jeffrey Epstein is named a Defendant. In those cases, the undersigned has been handling other matters associated therewith.
3. Additionally, Defendant's counsel is in the midst of preparing for a state court trial, CARDIOPULMONARY & PRIMARY CARE ASSOC. OF TREASURE COAST, P.A v. LEWIS, M.D., Case No. 562008CA001726, specially set for trial beginning May 13

Jane Doe No. 3 v. Epstein
Page 2

through 15, 2009). Discovery in that case is ongoing with several depositions set to prepare for trial.

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 reply.

5. An extension until May 20, 2009, is fair and reasonable under the circumstances. The undersigned is in need of the additional time in order to fully and adequately prepare a response on behalf of EPSTEIN.

6. As certified below, counsel for Defendant conferred with counsel by e-mail, and Plaintiff's counsel is in agreement with the requested extension.

WHEREFORE Defendant respectfully requests that this Court enter an order granting an extension until May 20, 2009, to file a Reply to Plaintiff's Response in Opposition to Defendant's Motion to Stay Complaint.

Local Rule 7.1 Statement

Counsel for the movant conferred by e-mail with counsel for the Plaintiff and Counsel for Plaintiff is in agreement with the requested extension until May 20, 2009 for Defendant to reply to Plaintiff's Response to Defendant's Motion to Stay Complaint.

Robert D. Critton, Jr. Attorney for
Defendant Epstein

Certificate of Service

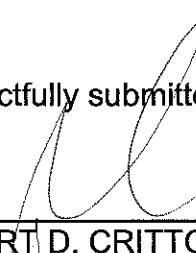
I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following Service List in the manner specified by CM/ECF on this 5th day of May, 2009:

Jane Doe No. 3 v. Epstein
Page 3

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 #2

Jack Alan Goldberger
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)