

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 09-80591-MARRA/JOHNSON

JANE DOE No. 101,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant,

/

**DEFENDANT JEFFREY EPSTEIN'S UNOPPOSED MOTION FOR EXTENSION
OF TIME IN WHICH TO RESPOND TO COMPLAINT**

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 Complaint dated, April 17, 2009. Defendant seeks an extension until May 26, 2009, to file his response. As good cause in support of granting the motion, Defendant states:

1. On April 17, 2009 Plaintiff filed a Complaint [DE 1]. Defendant's response would be due on May 11, 2009.
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 preparing responses to Motions for Protective Order and 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

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

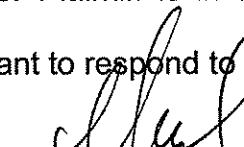
4. The requested extension is fair in reasonable under the circumstances as it will provide time to allow the Defendant, EPSTEIN, to fully and adequately respond.

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 respectfully requests that this Court enter an order granting an extension until May 26, 2009, to file a response to Plaintiff's Complaint.

Local Rule 7.1 Statement

Counsel for the movant conferred by telephone and correspondence with counsel for the Plaintiff and Counsel for Plaintiff is in agreement with the requested extension until May 26, 2009 for Defendant to respond to Plaintiff's Complaint.



Robert D. Critton, Esq.
Attorney for Defendant

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 4 day of May, 2009

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Respectfully submitted,

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