

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- 80993-CIV-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

---

**PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME  
TO FILE MEMORANDUM IN OPPOSITION TO MOTIONS TO COMPEL  
PLAINTIFFS TO RESPOND TO DEFENDANT'S FIRST REQUEST  
TO PRODUCE AND FIRST SET OF INTERROGATORIES, ET AL.**

Plaintiffs, JANE DOES 2-7, by and through undersigned counsel, file this Motion for Enlargement to Time to File Memorandum in Opposition to Motions to Compel Plaintiffs to Respond to Defendant's First Request to Produce and First Set of Interrogatories, et al., pursuant to S.D. Fla.L.R. 7.1 and Fed.R.Civ.P. 6(b), and state as follows:

1. On April 2, 2009, Defendant Epstein filed two Motions to Compel in each of the above-captioned cases: (1) Motion to Compel Plaintiff to Respond to Defendant's First Request to Produce and to Overrule Objections, and for an Award of Defendant's Reasonable Expenses; and (2) Motion to Compel Plaintiff to Answer Defendant's First Set of Interrogatories, and to Overrule Objections, and for an Award of Defendant's Reasonable Expenses. Plaintiffs' responses to these

Motions are due on April 20, 2009.

2. Plaintiffs move for an enlargement of time to prepare and file their response to the Motions because of demands on Plaintiffs' counsel in this case and in other cases and matters. This includes an initial appellate brief presently due on April 24, 2009, in Doe v. School Bd. of Broward County and Scavella, case no. 09 -10394-E, Eleventh Circuit Court of Appeals.

3. Plaintiffs request an enlargement of time until April 29, 2009.

4. Pursuant to S.D.Fla.L.R. 7.1(A), Plaintiffs' counsel has conferred with counsel for Defendant regarding the relief sought in this Motion, who has advised Plaintiffs' counsel that Defendant has no objection to the enlargement of time requested.

WHEREFORE, Plaintiffs respectfully request an enlargement of time to file their response to the Motions to Compel et al., until and including April 29, 2009.

Dated: April 17, 2009

Respectfully submitted,

By: s/ Stuart S. Mermelstein  
Stuart S. Mermelstein (FL Bar No. 947245)  
[ssm@sexabuseattorney.com](mailto:ssm@sexabuseattorney.com)  
Adam D. Horowitz (FL Bar No. 376980)  
[ahorowitz@sexabuseattorney.com](mailto:ahorowitz@sexabuseattorney.com)  
MERMELSTEIN & HOROWITZ, P.A.  
*Attorneys for Plaintiffs*  
18205 Biscayne Blvd., Suite 2218  
Miami, Florida 33160  
Tel: 305-931-2200  
Fax: 305-931-0877

**CERTIFICATE OF SERVICE**

I hereby certify that on April 17, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day to all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Stuart S. Mermelstein.

**SERVICE LIST**  
**DOE vs. JEFFREY EPSTEIN**  
**United States District Court, Southern District of Florida**

Jack Alan Goldberger, Esq.  
[jgoldberger@agwpa.com](mailto:jgoldberger@agwpa.com)

Robert D. Critton, Esq.  
[rcritton@bclclaw.com](mailto:rcritton@bclclaw.com)

---

*/s/ Stuart S. Mermelstein*