

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 10-80309-CIV-Marra/Johnson

JANE DOE No. 103,

Plaintiff,
vs.

JEFFERY 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, February 23, 2010. Defendant seeks an extension until April 5, 2010, to file his response. As good cause in support of granting the motion, Defendant states:

1. On February 23, 2010 Plaintiff filed a Complaint [DE 1]. Defendant's response would be due on March 26, 2010.
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 and replies to various motions, and handling other matters associated therewith.
3. 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.
4. 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 April 5, 2010 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 April 5, 2010 for Defendant to respond to Plaintiff's Complaint.

/s/ Michael J. Pike
Robert D. Critton, 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 23rd day of March, 2010.

Robert C. Josefsberg, Esq.
Katherine W. Ezell, Esq.
Podhurst Orseck, P.A.
25 West Flagler Street, Suite 800
Miami, FL 33130
305 358-2800
Fax: 305 358-2382
rjosefsberg@podhurst.com
kezell@podhurst.com
Counsel for Plaintiff

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
Counsel for Defendant Jeffrey Epstein

Respectfully submitted,

By: /s/ Michael J. Pike
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
(*Counsel for Defendant Jeffrey Epstein*)