

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

CASE NO.: 08-CV-80119-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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

JANE DOE NO. 3,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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

JANE DOE NO. 4,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-CV-80381-MARRA/JOHNSON

JANE DOE NO. 5,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

TO FILE REPLY MEMORANDA IN SUPPORT OF MOTIONS TO COMPEL ANSWERS TO INTERROGATORIES AND PRODUCTION OF DOCUMENTS

Plaintiffs, JANE DOES 2-5, by and through undersigned counsel, file this Motion for Enlargement to Time to File Reply Memoranda in Support of Motion to Compel Answers to Interrogatories and Production of Documents, pursuant to S.D. Fla.L.R. 7.1 and Fed.R.Civ.P. 6(b), and state as follows:

1. Plaintiffs in the above-styled cases filed Motions to Compel Answers to Interrogatories and Production of Documents on March 2, 2009. Defendant Jeffrey Epstein served Memoranda in opposition to these Motions on March 25, 2009.

2. Plaintiffs move for an enlargement of time to prepare and file their replies in support of the Motions because of demands on Plaintiffs' counsel in other cases and matters. In particular, Plaintiffs' counsel has an initial appeal brief due in Doe v. School Bd. of Broward County and Scavella, case no. 09 -10394-E, Eleventh Circuit Court of Appeals. Plaintiffs' counsel also has an impending discovery deadline in Jones v. Archdiocese of New York, case no. 10069-06, Supreme Court of the State of New York, County of New York.

3. The Plaintiffs' replies in support of the subject Motions are presently due on April 6, 2009. Plaintiffs request an enlargement of time of two (2) weeks, until April 20, 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 reply memoranda in support of the Motions to Compel Answers to Interrogatories and Production of Documents, until and including April 20, 2009.

Dated: April 3, 2009

Respectfully submitted,

By: s/ Stuart S. Mermelstein
Stuart S. Mermelstein (FL Bar No. 947245)
ssm@sexabuseattorney.com
Adam D. Horowitz (FL Bar No. 376980)
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 3, 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

Robert D. Critton, Esq.
rcritton@bclclaw.com

/s/ Stuart S. Mermelstein