

**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.

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,

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-80994-CIV-MARRA/JOHNSON

JANE DOE NO. 6,

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 08-80993-CIV-MARRA/JOHNSON

JANE DOE NO. 7,

Plaintiff,

JEFFREY EPSTEIN

Defendant.

C.M.A.,

CASE NO.: 08-80811-CIV-MARRA/JOHNSON

Plaintiff,

JEFFREY EPSTEIN

Defendant.

JANE DOE,

CASE NO.: 08-80893-CIV-MARRA/JOHNSON

Plaintiff,

JEFFREY EPSTEIN et al,

Defendants.

DOE II,

CASE NO.: 09-80469-CIV-MARRA-JOHNSON

Plaintiff,

JEFFREY EPSTEIN et al,

Defendants.

JANE DOE NO. 101,

CASE NO.: 09-80591-CIV-MARRA-JOHNSON

Plaintiff,

JEFFREY EPSTEIN

Defendant.

JANE DOE NO. 102,

CASE NO.: 09-80656-CIV-MARRA/JOHNSON

Plaintiff,

JEFFREY EPSTEIN,

Defendant.

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY TO PLAINTIFFS' JANE DOE 2 -7 RESPONSES IN
OPPOSITION TO MOTION TO COMPEL ANSWERS TO 1ST SET OF
INTERROGATORIES AND 1ST REQUEST FOR PRODUCTION**

Defendant, Jeffrey Epstein, (hereinafter "Epstein") by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to reply to Plaintiffs' Responses In Opposition to Defendant's Motion to Compel Answers to Interrogatories And Production of Documents, dated March 2, 2009. Local General Rule 7.1 A.1 and Rule 6, Fed. R. Civ. P. (2009). Defendant seeks an extension until May 22, 2009, to file his response. As good cause in support of granting the motion, Defendant states:

1. Defendant's reply to the Plaintiff's Responses in Opposition to Defendant's Motion to compel would be due on May 18, 2009. As certified below, Plaintiff's counsel is in agreement with the requested extension of May 20, 2009.
2. Plaintiff's counsel also represents five other Plaintiffs pursuing claims against Defendant, EPSTEIN. A total of five of the Plaintiffs have also filed Responses In Opposition to Defendant's Motions to Compel bearing the same dates. In order to fully and adequately respond to this and the other motions, Defendant is in need of an extension until May 20, 2009.
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 reply to this and the other Responses in Opposition to Defendant's Motion to Compel.

WHEREFORE, Defendant requests that this Court enter an order granting the Defendant an extension until May 20, 2009, in which to respond to Plaintiff's Response in Opposition to Defendant's Motion to Compel Answers to Interrogatories and Production of documents.

Local Rule 7.1 Certification

Counsel for the movant conferred by telephone with counsel for the Plaintiff and

Counsel for Plaintiff is in agreement with the requested extension until May 20, 2009 for Defendant to respond to the motion to compel.



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 18th day of May, 2009:

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)