

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 08-80804-CIV-MARRA/JOHNSON

**JANE DOE, a/k/a,
JANE DOE NO. 1,**

Plaintiff,

vs.

**JEFFREY EPSTEIN, HALEY
ROBSON, and SARAH KELLEN,**

Defendants.

**PLAINTIFF'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE
CIVIL RICO CASE STATEMENT PURSUANT TO LOCAL RULE 12.1**

Plaintiff Jane Doe moves, pursuant to Rule 7.1(A) of the Local Rules of the United States District Court for the Southern District of Florida, for an enlargement of time to file a Civil RICO Case Statement under Local Rule 12.1 until fifteen days after the Court rules on her motion to remand, which will be filed on or about August 18, 2008.

1. Defendants removed this action to federal court on July 21, 2008. (DE 1).
2. Because Plaintiff has pleaded a cause of action under section 772.103, Florida Statutes, she is required to file a Civil RICO Case Statement within thirty days of removal. *See* S.D. Fla. L.R. 12.1.
3. Plaintiff believes this action was improperly removed from state court and shall file a motion to remand on or about August 18, 2008. It is Plaintiff's contention that the Court lacks subject matter jurisdiction over this case because it does not involve a federal question or parties with complete diversity of citizenship.

4. If this action was improperly removed, Plaintiff should not be required to expend the time and expense necessary to create and file a Civil Rico Cast Statement, which would not be required in Florida state court.

WHEREFORE, Plaintiff respectfully request the Court grant her motion for an enlargement of time to file a Civil RICO Case Statement until fifteen days after the Court rules on her motion to remand.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1.A.3

On August 13, undersigned counsel conferred with counsel for the Defendants in a good faith effort to resolve the issues raised in this motion, and Defendants' counsel advised that Defendants do not oppose this motion.

s/ Spencer T. Kuvin
Spencer T. Kuvin (Florida Bar Number 089737)

Certificate of Services

I hereby certify that on August 13, 2008, 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 on all counsel of record or pro se parties identified 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 counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

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SERVICE LIST

Doe v. Epstein, et. al.

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United States District Court, Southern District of Florida

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_____ /

PROPOSED ORDER

THIS CAUSE having come before this Court upon Plaintiff Jane Doe's UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE CIVIL RICO CASE STATEMENT PURSUANT TO LOCAL RULE 12.1, and this Court being fully advised, it is hereby ORDERED AND ADJUDGED that:

1. The Motion is hereby granted.
2. Plaintiffs shall have an enlargement of time to file a Civil RICO Case Statement until fifteen (15) days after their motion for remand is decided.

DONE AND ORDERED this _____ day of _____, 2008.

HON. KENNETH A. MARRA
UNITED STATES DISTRICT JUDGE

Copies furnished to: All counsel