

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 MOTION TO STAY AND/OR CONTINUE ACTION**

Plaintiffs, JANE DOES 2-7, by and through undersigned counsel, file this Motion for Enlargement to Time to File Memorandum in Opposition to Motion to Stay and/or Continue Action, pursuant to S.D. Fla.L.R. 7.1 and Fed.R.Civ.P. 6(b), and state as follows:

1. Defendant Epstein filed a Motion to Stay and/or Continue Action for Time Certain Based on Parallel Civil and Criminal Proceedings, in each of the above-captioned cases, on March 25, 2009. Plaintiffs response to this Motion is due on April 13, 2009.
2. Plaintiffs move for an enlargement of time to prepare and file their responses to the Motion 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.

3. Plaintiffs request an enlargement of time of ten (10) days, until April 23, 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 Motion to Stay et al., until and including April 23, 2009.

Dated: April 23, 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 23, 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