

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 4,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

**PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO DEFENDANT'S MOTION FOR STAY**

Plaintiff, Jane Doe No. 4, by and through undersigned counsel, files this Motion for Enlargement of Time to Respond to Defendant's Motion for Stay, and states as follows:

1. Defendant filed his Motion for Stay on June 20, 2008. Plaintiff's response is due on or before July 10, 2008.
2. Defendant's Motion for Stay is based upon the existence of purported parallel criminal actions, and is grounded in section 3509(k) of Title 18, United States Code.
3. Subsequent to filing his Motion for Stay on July 1, 2008, Defendant Epstein filed a Notice advising this Court that the State Court criminal action against the Defendant was resolved, but that the federal criminal proceeding remained pending. It is Plaintiff's counsel's understanding from press reports, however, that the federal criminal proceeding will be resolved in the same plea deal, which would make the Defendant's Motion for Stay moot.¹
4. Therefore, Plaintiff respectfully requests a brief enlargement of time of twenty (20 days) within which to file a memorandum in opposition to Defendant's Motion for Stay. This

request for enlargement of time is in the interest of judicial economy and efficiency.

5. Additionally, Plaintiff's counsel requests this enlargement of time due to the demands on their time in other cases and matters.

6. Prior to filing this Motion, Plaintiff's counsel, Adam Horowitz, attempted to confer with defense counsel, to no avail.

WHEREFORE, Plaintiff respectfully request that this Court enter an order enlarging by twenty (20) days the time within which the Plaintiff may respond to the Defendant's Motion for Stay, until July 30, 2008.

Dated: July 10, 2008.

Respectfully submitted,

By: s/ Adam D. Horowitz.
Jeffrey M. Herman (FL Bar No. 521647)
jherman@hermanlaw.com
Stuart S. Mermelstein (FL Bar No. 947245)
ssm@hermanlaw.com
Adam D. Horowitz (FL Bar No. 376980)
ahorowitz@hermanlaw.com
HERMAN & MERMELSTEIN, P.A.
Attorneys for Plaintiffs Jane Doe
18205 Biscayne Blvd., Suite 2218
Miami, Florida 33160
Tel: 305-931-2200
Fax: 305-931-0877

¹ Plaintiff opposes the Motion for Stay on its merits under 18 U.S.C. §3509(k).

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 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 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/ Adam D. Horowitz

SERVICE LIST
DOE vs. JEFFREY EPSTEIN
CASE NO.: 08-CV-80380-MARRA/JOHNSON
United States District Court, Southern District of Florida

Jack Alan Goldberger
jagesq@bellsouth.net

Michael R. Tein
tein@lewistein.com

/s/ Adam D. Horowitz