

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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

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

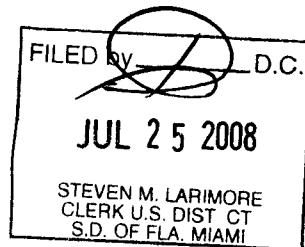
Plaintiff,

vs.

JEFFREY EPSTEIN, HALEY  
ROBSON, and SARAH KELLEN,

Defendants.

Sealed



FILED UNDER SEAL

**DEFENDANTS JEFFREY EPSTEIN AND SARAH KELLEN'S  
MOTION TO FILE UNDER SEAL**

Lewis Tein PL  
ATTORNEYS AT LAW

3059 GRAND AVENUE, SUITE 340, COCONUT GROVE, FLORIDA 33133

X  
JG

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

Pursuant to Rule 5.4 of the Local Rules of the United States District Court for the Southern District of Florida, defendants Jeffrey Epstein and Sarah Kellen hereby move to file their motion for stay, as well as this motion, under seal, stating as follows:

1. In their motion for stay, defendants Jeffrey Epstein and Sarah Kellen refer to a confidential agreement between the United States Attorney's Office for the Southern District of Florida and Jeffrey Epstein.
2. The information contained in the confidential agreement is material to this Court's consideration of the defendants' motion for stay.
3. To avoid disclosure of confidential material, the defendants request leave to file their motion for stay, and this motion, under seal.
4. We recognize that this Court has previously unsealed documents referring to this same agreement. We mean in no way to disregard that order, but seek merely to comply with the confidentiality clause in that agreement for this new and independent filing, in an abundance of caution, until directed otherwise by the Court.
5. The undersigned are authorized to represent that defendant Sarah Kellen joins in this motion.

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WHEREFORE, defendants Jeffrey Epstein and Sarah Kellen respectfully request leave to file this motion and their motion for stay, under seal.

Respectfully submitted,

LEWIS TEIN, P.L.  
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By:



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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

Undersigned counsel has conferred in good faith with counsel for the plaintiff, who opposes the relief requested in this motion.



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Michael R. Tein

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing document is being served this day, July 25, 2008, on counsel of record identified on the service list by U.S. Mail.



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Michael R. Tein

**Service List**

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