

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 10-80309-MARRA/JOHNSON

JANE DOE NO. 103

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

**PLAINTIFF'S AGREED MOTION FOR FURTHER EXTENSION OF TIME TO FILE
RESPONSE TO DEFENDANT EPSTEIN'S AMENDED MOTION TO DISMISS
COUNT VI AND FOR MORE DEFINITE STATEMENT AND TO STRIKE**

Plaintiff, Jane Doe No. 103, by and through her undersigned counsel, moves this Court for the entry of an order granting a further extension of time to file response to Defendant Epstein's Amended Motion to Dismiss Count VI and for More Definite Statement and to Strike [DE 15], on the following grounds:

1. Plaintiff's response to Defendant Epstein's Amended Motion to Dismiss Count VI and for More Definite Statement and to Strike is presently due on May 13, 2010, pursuant to an earlier extension granted by the Court upon an agreed motion [DE 17].
2. The Parties are in the process of resolving this matter, and the subject motion and response will become moot.
3. An extension of one week should be sufficient to allow the Parties time to complete the settlement process, including the filing of the Parties' Stipulation for Dismissal.

CASE NO.: 10-80309-WJZ

WHEREFORE, Plaintiff, Jane Doe No. 103, respectfully requests that this Court grant Plaintiff's Agreed Motion for Further Extension of Time to File a Response to Defendant Epstein's Amended Motion to Dismiss Count VI and for More Definite Statement and to Strike.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1.A.3

Undersigned counsel conferred with counsel for Defendant Jeffrey Epstein, Robert Critton, Esquire, who advised that we may represent to the Court that he is in agreement with this motion.

DATED this 13th day of May, 2010.

Respectfully submitted,
PODHURST ORSECK, P.A.
Attorneys for Plaintiff Jane Doe No. 103

By: s/Katherine W. Ezell
Robert C. Josefsberg
Fla. Bar No. 040856
rjosefsberg@podhurst.com
Katherine W. Ezell
Fla. Bar No. 114771
kezell@podhurst.com
City National Bank Building
25 W. Flagler Street, Suite 800
Miami, FL 33130
Telephone: (305) 358-2800
Facsimile: (305) 358-2382

CASE NO.: 10-80309-WJZ

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 13th day of May, 2010, a copy of the foregoing was served this day on all counsel of record on the attached Service List via e-mail transmission.

Respectfully submitted,

PODHURST ORSECK, P.A.

Attorneys for Plaintiff Jane Doe No. 103

By: s/Katherine W. Ezel
Robert C. Josefsberg
Fla. Bar No. 040856
rjosefsberg@podhurst.com
Katherine W. Ezel
Fla. Bar No. 114771
kezell@podhurst.com
City National Bank Building
25 W. Flagler Street, Suite 800
Miami, FL 33130
Telephone: (305) 358-2800
Facsimile: (305) 358-2382

CASE NO.: 10-80309-WJZ

SERVICE LIST

JANE DOE NO. 103 v. JEFFREY EPSTEIN
Case No.: 10-80309
United States District Court, Southern District of Florida

Robert Critton, Esq.
Michael J. Pike, Esq.
Burman, Critton, Luttier & Coleman LLP
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401
Phone: (561) 842-2820/Fax: (561) 515-3148
rcrit@bclclaw.com
mpike@bclclaw.com
Counsel for Defendant, Jeffrey Epstein

Jack Goldberger, Esq.
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
Phone: (561) 659-8300/Fax: (561) 835-8691
jagesq@bellsouth.net
Co-Counsel for Defendant, Jeffrey Epstein

Bruce E. Reinhart, Esq.
Bruce E. Reinhart, P.A.
250 South Australian Avenue, Suite 1400
West Palm Beach, FL 33401
Phone: (561) 202-6360/Fax: (561) 828-0983
ecf@brucereinhardtllaw.com
Counsel for Co-Defendant, Sarah Kellen

Jack Scarola, Esq.
Jack P. Hill, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300/Fax: (561) 383-9456
jsx@searcylaw.com

CASE NO.: 10-80309-WJZ

iph@searcylaw.com

Counsel for Plaintiff in related Case No. 08-80811

Adam Horowitz, Esq.

Stuart Mermelstein, Esq.

Mermelstein & Horowitz, P.A.

18205 Biscayne Blvd., Suite 2218

Miami, FL 33160

Phone: (305) 931-2200/Fax: (305) 931-0877

ahorowitz@sexabuseattorney.com

smermelstein@sexabuseattorney.com

Counsel for Plaintiffs in Related Cases Nos. 08-80069, 08-80119, 08-80232, 08-80380, 08-80381, 08-80993, 08-80994

Spencer Todd Kuvin, Esq.

Theodore Jon Leopold, Esq.

Leopold Kuvin, P.A.

2925 PGA Boulevard, Suite 200

Palm Beach Gardens, FL 33410

Phone: (561) 515-1400/Fax: (561) 515-1401

skuvin@leopoldkuvin.com

tleopold@leopoldkuvin.com

Counsel for Plaintiff in Related Case No. 08-08804

Brad Edwards, Esq.

Farmer, Jaffe, Weissing, Edwards,

Fistos & Lehrman, P.L.

425 North Andrews Avenue, Suite 2

Fort Lauderdale, FL 33301

Phone: (954) 524-2820/Fax: (954) 524-2822

brad@pathtojustice.com

Counsel for Plaintiff in Related Case No. 08-80893

Isidro Manuel Garcia, Esq.

Garcia Elkins & Boehringer

224 Datura Avenue, Suite 900

West Palm Beach, FL 33401

Phone: (561) 832-8033/Fax: (561) 832-7137

isidrogarcia@bellsouth.net

Counsel for Plaintiff in Related Case No. 08-80469