

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 09-CIV- 80469 – MARRA/JOHNSON

JANE DOE II,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

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**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION TO FILE**  
**A RESPONSE TO COMPLAINT**

Defendant, Jeffrey Epstein, (hereinafter "Epstein") by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to file his Response to Plaintiff's Complaint.

1. On March 25, 2009 Plaintiff filed a Complaint [DE 1] in the within matter. Plaintiff and Defendant counsel agreed Defendant would file a response by May 1, 2008. Defendant is requesting a five day extension to May 6, 2009 to respond.

2. There are several other cases filed with this Court in which Jeffrey Epstein is named a Defendant. In those cases, the undersigned has been handling other matters associated therewith.

3. Additionally, Defendant's counsel is in the midst of preparing for a state court trial, CARDIOPULMONARY & PRIMARY CARE ASSOC. OF TREASURE COAST, P.A v. LEWIS, M.D., Case No. 562008CA001726, specially set for trial beginning May 13

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through 15, 2009). Discovery in that case is ongoing with several depositions set to prepare for trial.

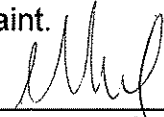
4. An extension until May 6, 2009, is fair and reasonable under the circumstances. The undersigned is in need of the additional time in order to fully and adequately prepare a response on behalf of EPSTEIN.

5. As certified below, counsel for Defendant conferred with Plaintiff's counsel counsel by telephone, and Plaintiff's counsel is in agreement with the requested extension.

WHEREFORE Defendant respectfully requests that this Court enter an order granting an extension until May 6, 2009, to file a Response to Plaintiff's Complaint.

**Local Rule 7.1 Statement**

Counsel for the movant conferred by telephone with counsel for the Plaintiff and Counsel for Plaintiff is in agreement with the requested extension until May 6, 2009 for Defendant to file a Response to Plaintiff's Complaint.

  
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Robert D. Critton, Jr. Attorney for  
Defendant Epstein

**Certificate of Service**

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed 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 identified on the following service list in the manner specified via transmission of Notices of Electronic Filing generated by CM/ECF on this 1<sup>st</sup> day of May, 2009:

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Respectfully submitted,

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