

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 09-80469-Cr-Marra/Johnson

JANE DOE II,
Plaintiff,

vs.

JEFFREY EPSTEIN,
and SARAH KELLEN,
Defendants.

_____ /

MOTION TO ADOPT CO-DEFENDANT EPSTEIN'S
MOTION TO DISMISS AND REPLY

Defendant SARAH KELLEN, by and through undersigned counsel, respectfully requests leave to adopt, as her own, co-defendant Jeffrey Epstein's Motion to Dismiss and Reply and as grounds states:

1. Plaintiff filed the instant action against Mr. Epstein and Ms. Kellen in March 2009.
2. On July 22, 2009, United States District Judge Kenneth L. Marra granted Ms. Kellen leave until August 3, 2009, to file a responsive pleading in the instant action (DE 49).
3. By this Motion, Ms. Kellen seeks to file a responsive pleading in this action by adopting as if set forth legally and factually by Ms. Kellen, co-defendant Jeffrey Epstein's Motion to Dismiss Plaintiff's Complaint and Supporting Memorandum and Exhibits (DE 13), filed May 6, 2009, and co-defendant Jeffrey Epstein's Reply in Opposition to Plaintiff's Response in Opposition to Epstein's Motion to Dismiss (DE 31), filed June 1, 2009.
4. Ms. Kellen requests leave of the Court to adopt these motions as if they were her own without burdening the record with a duplicative filing.

WHEREFORE, Defendant Kellen respectfully requests this Court grant this Motion and permit her to adopt co-defendant Jeffrey Epstein's Motion to Dismiss Plaintiff's Complaint and Supporting Memorandum and Exhibits (DE 13), filed May 6, 2009, and co-defendant Jeffrey Epstein's Reply in Opposition to Plaintiff's Response in Opposition to Epstein's Motion to Dismiss (DE 31), filed June 1, 2009, as if each were set forth factually and legally by Ms. Kellen in their totality.

Respectfully submitted,

BRUCE E. REINHART, P.A.

By: /s/ Denise Kalland

DENISE KALLAND

Florida Bar No. 39025

250 S. Australian Avenue

Suite 1400

West Palm Beach, Florida 33401

Tel: (561) 202-6360

Fax: (561) 863-8691

Dkalland@BruceReinhartLaw.com

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on August 1, 2009 the undersigned served copies of Sarah KELLEN'S Motion to Adopt Co-Defendant Epstein's Motion to Dismiss and Reply by electronic CM/ECF filing to all counsel of record.

/s/Denise Kalland

DENISE KALLAND