

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80736-CIV-MARRA/JOHNSON

JANE DOE 1 and JANE DOE 2,

Plaintiffs

v.

UNITED STATES OF AMERICA,

Defendant

/

**INTERVENOR EPSTEIN'S UNOPPOSED MOTION FOR A SUPPLEMENTAL
PROTECTIVE ORDER**

Now comes Intervenor, Jeffrey Epstein, who moves that this Honorable Court issue a supplemental Protective Order that would expand the limited Protective Order allowed in its decision Granting in Part and Denying in Part the Intervenors' Motion for a Protective Confidentiality Order. [D.E. 255 at 4]. The purpose of the proposed supplement to the previously ordered Protective Order is to require that any party would be required to file under seal any portion of the plea negotiation correspondence between the Government and Epstein's counsel, whether offered as an exhibit or quoted from in the content of a pleading or motion. Such a redacted filing would in all other respects be filed as a public filing unless subject to other orders of the Court, and each party would reserve the right to move to unseal any redacted pleading or sealed exhibit. After consultation with their counsel, both the Plaintiffs and the Government do not oppose the allowing of this Motion.

Respectfully submitted,

JEFFREY EPSTEIN
By His Attorneys,

/s/Roy Black
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CERTIFICATE OF SERVICE

I HERE CERTIFY that a true copy of the foregoing was filed via CM/ECF, this
8th day of October, 2014.

/s/Roy Black
Roy Black