

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 09-80591-MARRA/JOHNSON

JANE DOE No. 101,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant,

\_\_\_\_\_ /

**DEFENDANT JEFFREY EPSTEIN'S UNOPPOSED MOTION FOR EXTENSION  
OF TIME IN WHICH TO FILE A REPLY TO PLAINTIFF JANE DOE 101'S RESPONSE  
TO DEFENDANT'S MOTION TO DISMISS AMENDED COMPLAINT**

Defendant, Jeffrey Epstein, (hereinafter "Epstein") by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to reply to Plaintiff, Jane Doe 101's Response to Defendant, Epstein's Motion to Dismiss Amended Complaint [DE 56] dated June 26, 2009. Defendant seeks an extension until November 27, 2009, to file his reply. As good cause in support of granting the motion, Defendant states:

1. On May 1, 2009, Plaintiff filed an Amended Complaint [DE 9].
2. On May 26, 2009, Defendant filed a Motion to Dismiss Amended Complaint [DE 29].
3. On June 26, 2009, Plaintiff filed her Response to Defendant's Motion to Dismiss Amended Complaint [DE 56].

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4. Defendant's Reply to Plaintiff's Response to Defendant's Motion to Dismiss Amended Complaint is currently due on November 16, 2009.

5. The parties continue to work together to find a resolution in this case and are close to a resolution.

6. The requested extension is fair and reasonable under the circumstances as it will provide time to allow the Defendant, EPSTEIN, to fully and adequately respond.

7. As certified below, counsel for Defendant conferred with counsel for Plaintiff, 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 November 27, 2009, to file a Reply to Plaintiff's Response to Defendant's Motion to Dismiss Amended Complaint.

**Local Rule 7.1 Statement**

Counsel for the movant conferred by telephone and correspondence with counsel for the Plaintiff and Counsel for Plaintiff is in agreement with the requested extension until November 27, 2009 for Defendant to respond to Plaintiff's Complaint.

  
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Robert D. Critton Jr., Esq.  
Attorney for Defendant

**Certificate of Service**

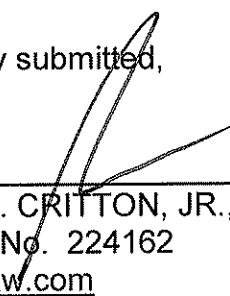
I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following Service List in the manner specified by CM/ECF on this 16<sup>th</sup> day of November, 2009

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Robert C. Josefsberg, Esq.  
Katherine W. Ezell, Esq.  
Podhurst Orseck, P.A.  
25 West Flagler Street, Suite 800  
Miami, FL 33130  
305 358-2800  
Fax: 305 358-2382  
[rjosefsberg@podhurst.com](mailto:rjosefsberg@podhurst.com)  
[kezell@podhurst.com](mailto:kezell@podhurst.com)  
*Counsel for Plaintiff*

Jack Alan Goldberger, Esq.  
Atterbury Goldberger & Weiss, P.A.  
250 Australian Avenue South  
Suite 1400  
West Palm Beach, FL 33401-5012  
561-659-8300  
Fax: 561-835-8691  
[jagesq@bellsouth.net](mailto:jagesq@bellsouth.net)  
*Counsel for Defendant Jeffrey Epstein*

Respectfully submitted,

By:   
ROBERT D. CRITTON, JR., ESQ.  
Florida Bar No. 224162  
[rcrit@bclclaw.com](mailto:rcrit@bclclaw.com)  
MICHAEL J. PIKE, ESQ.  
Florida Bar No. 617296  
[mpike@bclclaw.com](mailto:mpike@bclclaw.com)  
BURMAN, CRITTON, LUTTIER & COLEMAN  
515 N. Flagler Drive, Suite 400  
West Palm Beach, FL 33401  
561/842-2820 Phone  
561/515-3148 Fax  
*(Counsel for Defendant Jeffrey Epstein)*