

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80811-CIV-MARRA/JOHNSON

C.M.A.,

Plaintiff,

vs.

JEFFREY EPSTEIN and [REDACTED]
[REDACTED]

Defendants.

**PLAINTIFF'S MEMORANDUM IN OPPOSITION TO DEFENDANT, JEFFREY
EPSTEIN'S MOTION TO STAY AND OR CONTINUE ACTION FOR TIME CERTAIN
BASED ON PARALLEL CIVIL AND CRIMINAL PROCEEDINGS WITH
INCORPORATED MEMORANDUM OF LAW**

Plaintiff, C.M.A., by and through undersigned counsel, files this Memorandum in Opposition to Defendant, Jeffrey Epstein's Motion to Stay And Or Continue Action For Time Certain Based On Parallel Civil And Criminal Proceedings With Incorporated Memorandum of Law (D.E. 51), and states:

Defendant, Jeffrey Epstein, seeks to have this action stayed until late 2010. Epstein's Motion to Stay filed in the instant case is identical to the ones he filed in Jane Doe v. Epstein, Case No. 08-CV-90893, Jane Doe No. 2 v. Epstein, Case No. 08-CV-80119, Jane Doe No. 3 v. Epstein, Case No. 08-CV-80232, Jane Doe No. 4 v. Epstein, Case No. 08-CV-80380, Jane Doe No. 5 v. Epstein, Case No. 08-CV-80381, Jane Doe No. 6 v. Epstein, Case No. 08-CV-90994, and Jane Doe No. 7 v. Epstein, Case No. 08-80993, which are all currently pending before this Court. Counsel for Jane Doe No.1 and Jane Does No. 2-7 have both filed Memorandums in Opposition to Epstein's

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Motions for Stay in their respective cases. Rather than unnecessarily recite and duplicate their well-reasoned arguments in opposition to Epstein's Motions for Stay, C.M.A. incorporates by reference the arguments raised in Plaintiff's Response In Opposition to Defendant's Motion to Stay Complaint in Jane Doe No.1 v. Epstein (Case No. 08-CV-80893, D.E. 31)(Attached hereto as Exhibit "1") and Plaintiff's Memorandum in Opposition to Motion to Stay and or Continue Action in Jane Doe No. 2 v. Epstein (Case No. 08-CV-80119, D.E. 82)(Attached hereto as Exhibit "2") in her Memorandum in Opposition to Epstein's Motion For Stay as if they had fully been set forth herein.

WHEREFORE, in light of the foregoing, the Plaintiff respectfully requests this Court enter an order denying Defendant, Jeffrey Epstein's Motion to Stay And Or Continue Action For Time Certain Based On Parallel Civil And Criminal Proceedings With Incorporated Memorandum of Law.

Respectfully submitted,

/s/ Jack P. Hill

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 24, 2009, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified above via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/Jack P. Hill

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