

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

I.

UNITED STATES
_____ /

JANE DOE #1 AND JANE DOE #2'S PROTECTIVE MOTION FOR REMEDIES

COME NOW Jane Doe #1 and Jane Doe #2 (also referred to as "the victims"), by and through undersigned counsel, to file this protective motion for remedies for violations of their rights under the Crime Victims' Rights Act.

In their concurrently-filed response to the Government's motion to dismiss and sealed response to the Government's motion to dismiss, the victims' outline numerous remedies that would be proper once they prove the Government violated the CVRA. At various points in its earlier pleadings, however, the Government seems to contend that the fact that the victims have not formally filed a motion asserting each and every one of these specific remedies may have some significance in this case. The Government also inaccurately describes the remedies the victims are seeking.

As the Court is aware, this case presents various issues of first impression and the procedures that the crime victims should follow to protect their CVRA rights are not clearly established. Accordingly, to protect their right to seek all of the remedies they are seeking, the victims protectively file this motion asking the Court to award all these remedies that they

outline in their responses to the motion to dismiss. The Court should award all of these remedies to the victims for the reasons explained in their pleadings and because these remedies address the Government's violations of their rights.

DATED: December 5, 2011

Respectfully Submitted,

s/ Bradley J. Edwards _____
Bradley J. Edwards
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301



and

Paul G. Cassell
Pro Hac Vice
S.J. Quinney College of Law at the
University of Utah
332 S. 1400 E.
Salt Lake City, UT 84112



Attorneys for Jane Doe #1 and Jane Doe #2

CERTIFICATE OF SERVICE

The foregoing document was served on December 5, 2011, on the following using the Court's CM/ECF system:

