

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 08-80736-Civ-Marra/Matthewman**

JANE DOE #1 AND JANE DOE #2,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

**THE PARTIES' JOINT STATUS REPORT AND MOTION
FOR REVISED BRIEFING AND DISCOVERY SCHEDULE**

The parties, by and through their undersigned counsel, hereby file this Joint Status Report and Motion for Revised Briefing and Discovery Schedule. In support thereof, the parties state:

1. Briefing and responses to discovery in this matter were stayed while the parties pursued settlement negotiations with the assistance of U.S. Magistrate Judge Dave Lee Brannon. After Judge Brannon declared an impasse, the parties continued to pursue settlement. While those efforts will continue, at this time the parties believe that the Court should re-institute a briefing schedule on the petitioners' pending summary judgment motion and re-set the deadline for the government to respond to the petitioners' amended discovery requests.

2. The parties have conferred and jointly request that the Court extend these deadlines as set below to allow the parties time to continue exploring resolution of the matter while also moving towards resolution if settlement cannot be reached.

3. Should the parties be unable to resolve the matter, the parties have agreed to ask that the Court enter an amended briefing and response schedule as follows:

October 17, 2016 Government's Responses to Outstanding Discovery Requests Due

October 17, 2016 Government's Response to Petitioners' Motion for Summary Judgment and Cross-Motion for Summary Judgment Due

November 21, 2016 Petitioners' Reply to Government's Response and Response to Government's Cross-Motion Due

December 12, 2016 Government's Reply to Petitioners' Response Due.

CONCLUSION

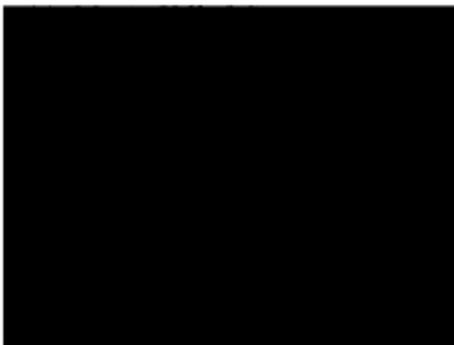
For the foregoing reasons, the parties respectfully request that the Court impose the proposed briefing/discovery schedule. A proposed Amended Scheduling Order is attached.

Respectfully submitted,

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

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By: 



COUNSEL FOR PETITIONERS

COUNSEL FOR RESPONDENTS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 22, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. According to the Court's website, counsel for all parties are able to receive notice via the CM/ECF system.



SERVICE LIST

Jane Does 1 and 2 v. United States,
Case No. 08-80736-CIV-MARRA/MATTHEWMAN
United States District Court, Southern District of Florida

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