

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO.2,

Plaintiff,

CASE NO.; 08-CV-80119-MARRA/JOHNSON

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO.3,

CASE NO.; 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO.4,

CASE NO.; 08-CV-80380-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5,

CASE NO.; 08-CV-80381-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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JANE DOE NO. 6,

Plaintiff,

CASE NO.; 08-CV-80994-MARRA/JOHNSON

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE NO. 7,

CASE NO.; 08-CV-80993-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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CASE NO.; 08-CV-80811-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE,

CASE NO.; 08-CV-80893-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

_____/

DOE II,

Plaintiff,

CASE NO.; 08-CV-80469-MARRA/JOHNSON

vs.

JEFFREY EPSTEIN, et al,

Defendants.

_____/

JANE DOE NO. 101,

CASE NO.; 08-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE NO. 102,

CASE NO.; 08-CV-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

AFFIDAVIT OF MICHAEL J. PIKE, ESQUIRE

STATE OF FLORIDA)
) SS
COUNTY OF PALM BEACH)

PERSONALLY APPEARED before the undersigned Notary Public, Michael J. Pike, Esq., who after being sworn states the following:

1. My name is Michael Pike, and I am one of the attorneys assigned to this matter. Burman, Critton, Luttier and Coleman, LLP, Robert D. Critton, Jr., Esq., J. Michael Burman, Esq., and I represent Jeffrey Epstein. I have knowledge of the facts outlined in the Motion to Strike Cases from Current Trial Dockets and/or Motion to Continue Cases and/or Motion to Modify Trial and Scheduling Orders ("Motion to Strike"). I have fully read the Motion, and I personally drafted the Motions and Replies to various discovery responses identified by docket entry in the Motion to Strike.

2. The information set forth in the Motion to Strike is true and accurate in that the undersigned law firm, on behalf of Jeffrey Epstein, has attempted in good faith to obtain discovery in preparation for trial and in accordance with this Court's Order Setting Trial Date and Discovery Deadlines, Referring Case to Mediation and Referring Discovery Motions to the United States Magistrate Judge.

3. Unfortunately, due to the Plaintiff's delays, objections to relevant discovery and refusal to allow Jeffrey Epstein to identify Plaintiffs in other Third-Party Subpoenas, the undersigned has a good faith belief that it will be impossible to complete discovery pursuant to the Court's Scheduling Order. In fact, as outlined in the Motion to Strike, it is abundantly clear that Jeffrey Epstein has not been afforded any meaningful discovery and cannot properly prepare the cases for trial. It will also be impossible to satisfy the remaining schedules referenced in the Motion.

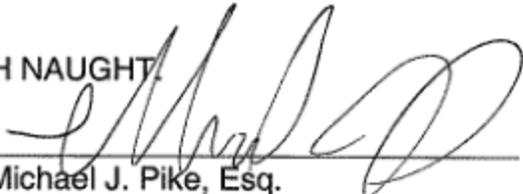
4. In short, Plaintiffs have refused and/or failed to produce any

meaningful discovery and/or answer any meaningful discovery responses. As a result, the undersigned has not had an opportunity to depose any individuals that may have information about the allegations made by Plaintiffs.

5. Next, as stated in the Motion to Strike, Plaintiffs' counsel refuses to allow the undersigned law firm to identify Plaintiffs by their true legal names in the style of the case and/or identify the Plaintiffs in any third party subpoenas, which has effectively prevented the undersigned law firm from obtaining any meaningful discovery about the Plaintiffs and/or the damages they seek. As stated in the Motion to Strike, Brad Edwards has agreed to such a procedure relative to third party subpoenas.

6. As a result, good cause has been shown to continue the actions or modify the schedules. Therefore, the cases should be struck from the current trial dockets, continued to the next available trial dockets or, alternatively, the discovery schedules and other related schedules outlined in the Court's Scheduling Orders should be modified as requested in the Motion. Without the granting of the Continuance and/or a Modified Scheduling Order, Mr. Epstein's due process rights will be violated in that he will not be able to prepare and properly defend the cases for trial. This will substantially prejudice Jeffrey Epstein.

FURTHER THE AFFIANT SAYETH NAUGHT.


Michael J. Pike, Esq.

STATE OF FLORIDA
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Michael J. Pike, Esquire, known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: MICHAEL J. PIKE, and that an oath was/was not taken.

WITNESS my hand and official seal in the County and State last aforesaid this 17th day of MAY, 2009.



Jessica Cadwell
PRINT NAME: JESSICA CADWELL
NOTARY PUBLIC/STATE OF FLORIDA
COMMISSION NO.:
MY COMMISSION EXPIRES: