

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE II)

Plaintiff,)

vs.)

JEFFREY EPSTEIN,)
and [REDACTED],)

Defendants.)
/

CASE NO.: 09-80469-CIV-MARRA

PLAINTIFF'S MOTION FOR DEFAULT AGAINST DEFENDANT [REDACTED]

Plaintiff, JANE DOE II, moves for a default against Defendant [REDACTED], and would show in support:

1. Defendant [REDACTED] has been avoiding service as detailed in the Affidavit of Service of Joseph Sanchez, attached as **Exhibit 1**.
2. Mr. Sanchez effected service on Defendant [REDACTED] in a manner authorized by New York State law, and Defendant [REDACTED] has failed to timely answer the complaint or otherwise respond thereto.
3. Defendant [REDACTED] is aware of this action and has in fact traveled to visit with Defendant EPSTEIN at the Palm Beach County Jail on several occasions.

WHEREFORE, Plaintiff respectfully requests that this Court enter a default against Defendant [REDACTED].

Respectfully submitted,

BY: s/ Isidro M. Garcia
ISIDRO M. GARCIA

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished **VIA ECM TRANSMISSION** to: Robert D. Critton, Esq. and Michael Pike, Esq., BURMAN CRITTON LUTTIER & COLEMAN, [REDACTED] this 12th day of June, 2009.

BY: s/ Isidro M. Garcia
ISIDRO M. GARCIA