

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-80069 CIV-MARRA/JOHNSON

JANE DOE NO.1, by and through
JANE DOE'S FATHER as parent and natural
guardian, and JANE DOE'S FATHER, and
JANE DOE'S STEPMOTHER, individually,

Plaintiffs,

JANE DOE'S MOTHER, individually and as parent
and natural guardian of JANE DOE NO. 1,

Intervenor-Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

**MOTION TO STAY PROCEEDINGS PENDING JANE
DOE NO. 1 REACHING AGE OF MAJORITY**

JANE DOE'S MOTHER, individually and as parent and natural guardian of JANE DOE NO. 1, by and through the undersigned counsel, moves the Court to stay these proceedings pending JANE DOE NO. 1 reaching the age of majority, and as grounds for said motion states as follows:

1. JANE DOE NO. 1 is a minor child, 17 years of age, who is under the joint control of her parents and natural guardians, JANE DOE'S FATHER and JANE DOE'S MOTHER, who are divorced.
2. JANE DOE NO. 1 will be 18 on May 13, 2008. *See affidavit of JANE DOE'S MOTHER (attached hereto as EXHIBIT "A").*
3. JANE DOE NO. 1 has been estranged from JANE DOE'S FATHER since Thanksgiving Day, November 22, 2007. *See Exhibit "A" (Affidavit of JANE DOE'S MOTHER).*

4. JANE DOE'S FATHER filed this lawsuit against Defendant Jeffrey Epstein without the knowledge, consultation or consent of JANE DOE NO. 1. *See Exhibit "A" (Affidavit of JANE DOE'S MOTHER).*

5. JANE DOE NO. 1 does not want this lawsuit to be prosecuted on her behalf by JANE DOE'S FATHER. *See Exhibit "A" (Affidavit of JANE DOE'S MOTHER).*

6. Pursuant to Local Rule 7.1.A.3, counsel for Intervenor-Plaintiff JANE DOE'S MOTHER, in a good faith attempt to resolve this dispute, made a reasonable effort to confer with all parties who may be affected by this motion to stay. Counsel for Intervenor-Plaintiff JANE DOE'S MOTHER conferred with Counsel for JANE DOE'S FATHER, who do not agree to the Court entering a stay in this action.

WHEREFORE, Intervenor-Plaintiff, JANE DOE'S MOTHER, moves the Court to stay these proceedings pending JANE DOE NO. 1 reaching the age of majority at which time she can decide whether, and how, to continue prosecution of this action.

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically on January 29th, 2008 with the Clerk of the Court through ECF, and that ECF will send an e-notice of the electronic filing to the following: Jeffrey M. Herman, [REDACTED] Stuart S. Mermelstein, [REDACTED] Adam D. Horowitz, [REDACTED]

Respectfully submitted,

/s/Theodore J. Leopold, Esq.
THEODORE J. LEOPOLD, ESQ.
Florida Bar No. 705608
RICCI~LEOPOLD, P.A.
2925 PGA Boulevard, Suite 200
Palm Beach Gardens FL 33410
[REDACTED]

EXHIBIT A

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

CASE NO.: 08-80069 CIV-MARRA/JOHNSON

**JANE DOE NO.1, by and through
JANE DOE's FATHER as parent and natural
guardian, and JANE DOE's FATHER, and
JANE DOE's STEPMOTHER, individually,**

Plaintiffs,

vs.

JEFFREY EPSTEIN,

Defendant.

AFFIDAVIT IN SUPPORT OF MOTION TO STAY PROCEEDINGS

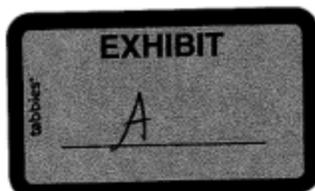
[REDACTED] being duly sworn deposes and says that:

1. I am the mother and natural guardian for Jane Doe No.1 as referenced in the Complaint filed on January 24, 2008, in the United States District Court Southern District of Florida, Case No. 08-80069 CIV-MARRA-JOHNSON. This Affidavit is filed in support of the Motion to Stay Proceedings.

2. Jane Doe No. 1 will be eighteen (18) years of age on May 13, 2008.

3. Jane Doe No.1 has been estranged from her father since Thanksgiving day, November 22, 2007.

4. On January 24, 2008, Jane Doe No.1's father filed a lawsuit on behalf of himself and as parent and natural guardian of Jane Doe No. 1 against Jeffrey Epstein in the United States District Court, Southern District of Florida, Case No. 08-80069 CIV-MARRA-JOHNSON. Jane Doe's



father filed this lawsuit against Defendant Jeffrey Epstein without the knowledge, consultation or consent of me or of my daughter, Jane Doe No.1.

5. Jane Doe No.1 does not want her lawsuit to be prosecuted on her behalf by her father.

FURTHER, AFFIANT SAYETH NOT.



STATE OF GEORGIA

ss:

COUNTY OF WALESKA

The foregoing instrument was acknowledged before me this 28 day of January, 2008 by DAWN LaVOGUE SANDBERG who is personally known to me or has produced GA Drivers Lianse as identification and who (did/did not) take an oath.

Tammy S Parker

Notary Public
Commission No.:

