

**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.**

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**UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
BRIEFING AND TO RESPOND TO DISCOVERY REQUESTS**

The Respondent, United States of America, by and through the undersigned Assistant United States of America, hereby files this unopposed motion for a 21-day extension of time to file briefing and to respond to outstanding discovery requests. In support thereof, the undersigned states:

1. Pursuant to the Court's Amended Scheduling Order (DE 356), the Respondent must file its response to Petitioners' motion for summary judgment and its own cross-motion for summary judgment, by March 24, 2016.

2. Petitioners also have served the government with amended discovery requests, and responses to those requests are currently due on February 22, 2016.

3. Counsel for the parties have conferred and jointly request that the Court extend these deadlines by twenty-one days to allow the parties time to explore resolution of the matter.

4. 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:

March 14, 2016      Government's Responses to Outstanding Discovery Requests Due

April 14, 2016 Government's Response to Petitioners' Motion for Summary Judgment and Cross-Motion for Summary Judgment Due

May 3, 2016 Petitioners' Reply to Government's Response and Response to Government's Cross-Motion Due

May 17, 2016 Government's Reply to Petitioners' Response Due.

5. This request is not interposed for purposes of delay, but rather to allow the parties sufficient time to meet and discuss outstanding issues.

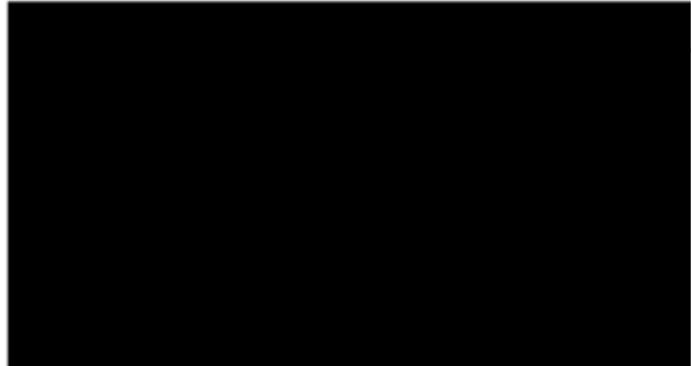
**CONCLUSION**

For the foregoing reasons, Respondent respectfully requests that the Court grant a 21-day extension of time to file briefing and to respond to outstanding discovery requests. A proposed Amended Scheduling Order is attached.

Respectfully submitted,

WIFREDO A. FERRER  
UNITED STATES ATTORNEY

By:



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 19, 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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