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June 14, 2017

VIA ECF

Hon. John G. Koeltl
United States District Court
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: Jane Doe 43 v. Jeffrey Epstein, et al.
Civil Action No. 17-cv-616**

Dear Judge Koeltl:

I am counsel to Defendants Jeffrey Epstein ("Epstein") and Lesley Groff ("Groff") in the above-referenced matter. I write to request that the briefing schedule for defendants' motion to dismiss be extended because I am presently engaged in a trial before Judge J. Paul Oetken in a matter captioned *United States v. Block*, 16 cr. 595 (JPO). The trial is scheduled through July 7, 2017.

Pursuant to the Stipulation and Order of May 15, 2017, plaintiff filed the First Amended Complaint on June 5, 2017, and defendants have until June 26, 2017 to move to dismiss. We respectfully request that the date for filing of the motion to dismiss be extended to two weeks after the completion of my trial, and that the briefing schedule be adjusted as follows:

	current schedule	requested schedule
Date for filing of motion	June 26, 2017	July 17, 2017
Date for filing of opposition	July 26, 2017	August 17, 2017
Date for filing of reply	August 9, 2017	August 31, 2017

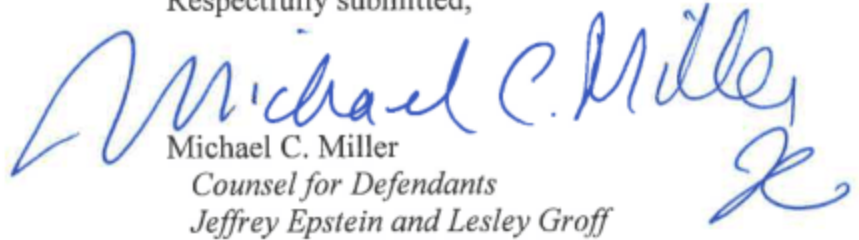
We also respectfully request on account of my trial schedule that the conference scheduled for July 6, 2017 be adjourned.

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We are advised that defendant Sarah Kellen joins in this request. After calling counsel for Plaintiff on June 12 and 13, we emailed him on June 13 with the above request and explanation for the request to see if Plaintiff would consent. Plaintiff has not responded to our request. Given the fast approaching deadline, we are writing to the court at this time with our request.

This is the first request for an extension of this briefing schedule. We previously made one request to adjourn the conference from May 22, 2017 because, as we explained in our May 18, 2017 letter to the court, it made practical sense to have the conference after Plaintiff has filed the amended complaint.

Respectfully submitted,


Michael C. Miller
*Counsel for Defendants
Jeffrey Epstein and Lesley Groff*