

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV- 80893 – MARRA/JOHNSON

JANE DOE,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**DEFENDANT'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO COMPLETE TRIAL DEADLINES**

Defendant, JEFFREY EPSTEIN, by and through his undersigned attorneys, respectfully moves this Court for an extension of time to complete trial deadlines, and as good cause in support of granting the motion, Defendant states:

1. This case is currently on a two week trial docket commencing on February 22, 2010.
2. The deposition of Plaintiff has not yet been taken.
3. The scheduling of depositions in this matter has become much more difficult since the case was consolidated on May 14, 2009, due to the number of attorneys involved and the fact that witnesses, plaintiffs and the defendant may only be deposed once. (See Order Consolidating Cases for Purpose of Discovery and Procedural Motions That Relate to Multiple Cases).

4. Due the fact that depositions are still being scheduled, it is premature to mediate, complete all substantive pretrial motions, disclose expert and exchange expert reports.

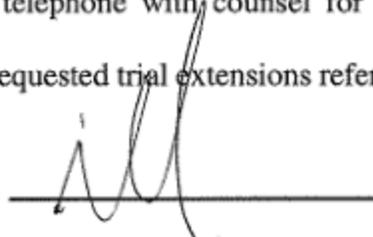
5. Defendant's counsel is in agreement with the following requested deadlines:

- | | | |
|----|---|------------|
| A. | New deadline to complete discovery: | 11/28/2009 |
| B. | New deadline to complete substantive pretrial motions: | 12/15/2009 |
| C. | New deadline to disclose experts and exchange expert reports: | 10/29/2009 |
| D. | New deadline to complete mediation: | 01/21/2010 |

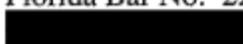
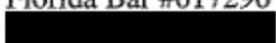
WHEREFORE, Defendant, JEFFREY EPSTEIN, requests that this Court enter an order granting Defendant's Motion for Extension of Time to Complete Trial Deadlines.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

Counsel for the movant conferred via telephone with counsel for the Defendant and counsel for the Defendant is in agreement with requested trial extensions referenced above.

By: 

ROBERT D. CRITTON, JR., ESQ.
Florida Bar No. 224162


MICHAEL J. PIKE, ESQ.
Florida Bar #617296


Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following service list in the manner specified via transmission of Notices of Electronic Filing generated by CM/ECF on this 19th day of August, 2009:

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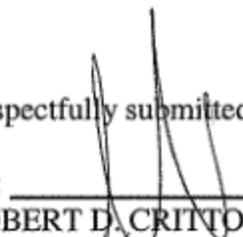
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Respectfully submitted,

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