

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JANE DOE 1 AND JANE DOE 2,

Petitioners,

*v.*

UNITED STATES OF AMERICA,

Respondent.

Civil Action No.

08-80736-CIV-MARRA

**Respondent's Motion for Enlargement of Time to Confer with Petitioners  
Regarding the Court's Opinion and Order of February 21, 2019**

The United States of America, by Byung J. Pak, United States Attorney for the Northern District of Georgia, and Jill E. Steinberg and Nathan P. Kitchens, Special Attorneys for the Southern District of Florida, files this Motion for Enlargement of Time to Confer with Petitioners Regarding the Court's Opinion and Order of February 21, 2019.

1. On February 21, 2019, the Court issued its Opinion and Order granting Petitioners' Motion for Partial Summary Judgment, denying the United States's Cross-Motion for Summary Judgment, and ordering the parties to confer and inform the Court by March 8, 2019 regarding how they wish to proceed on determining the issue of a remedy. [Doc. 435]

2. On February 22, 2019, the Court issued an Order clarifying that the parties were directed to confer and inform the Court regarding what submissions or

proceedings they believe are necessary for its determination of a remedy. [Doc. 437]

3. On the afternoon of March 1, 2019, the Department of Justice assigned the United States Attorney's Office for the Northern District of Georgia to represent the respondent in this matter. In accordance with that request, undersigned counsel were appointed as Special Attorneys on behalf of the respondent yesterday.

4. In order to facilitate undersigned counsel's preparation and provide a meaningful opportunity for the respondent to confer with the petitioners, the respondent requests an enlargement of time of ninety days, up to and including June 6, 2019, to confer with the petitioners and inform the Court regarding how the parties wish to proceed on the determination of a remedy.

5. This extension is necessary because undersigned counsel need sufficient time to review not only the voluminous filings on this docket, but also records in the state court prosecution and various civil actions related to this matter, which may be impacted by the Court's remedy in this action. This matter may raise novel issues of statutory interpretation, constitutional Due Process rights, and state law, which will require extensive legal research to assess the proper procedure for determining a remedy. Moreover, undersigned counsel need ample time to confer with the petitioners regarding their requested remedy and its potential impact on other victims. The requested extension will afford undersigned counsel an opportunity to understand the record, engage in

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meaningful discussion with the petitioners, and ultimately propose the most reasonable path forward to aid the Court's determination of a remedy.

6. On March 6, 2019, undersigned counsel contacted petitioners' counsel regarding the requested extension, and the parties conferred this morning. Petitioners' counsel authorized undersigned counsel to state that the petitioners leave the matter of an extension to the discretion of the Court with the hope that a resolution of these issues can be expedited.

WHEREFORE, the respondent respectfully requests an enlargement of time of ninety days, up to and including June 6, 2019, to confer with the petitioners and inform the Court regarding how the parties wish to proceed on the determination of a remedy.

Respectfully submitted,

BYUNG J. PAK  
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**Certificate of Service**

On behalf of the United States Attorney's Office for the Northern District of Georgia, I served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

March 7, 2019

/s/ DEXTER A. LEE

DEXTER A. LEE

*Assistant United States Attorney*