

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually,
and BRADLEY J, EDWARDS,
individually.

Defendants.

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY,
FLORIDA

CASE NO. 502009CA040800XXXXMBAG

**PLAINTIFF JEFFREY EPSTEIN'S
MOTION FOR AN ENLARGMENT OF TIME WITHIN WHICH TO MEDIATE**

Plaintiff Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Rule 1.090(b) of the *Florida Rules of Civil Procedure*, hereby requests this Honorable Court for an enlargement of time of ninety (90) days within which to comply with the Court's order or mediation. As grounds therefore, Epstein would state:

1. At Plaintiff's request, this Court entered an Order on April 19, 2012 directing the parties to participate in Mediation within sixty (60) days; to wit: on or before June 19, 2012.

2. Undersigned counsel was not counsel for Plaintiff on the date upon which this Order was entered.

3. Undersigned counsel has been reviewing the volumes of documents that have been produced in this case to date to prepare for all upcoming scheduled matters, including Mediation, and to comply with other deadlines imposed by both the Court and the *Florida Rules of Civil Procedure*.

4. Undersigned counsel has also been diligently preparing for multiple hearings on this case, including hearings scheduled for June 11, 2012 (which was cancelled on June 10, 2012) and June 12, 2012, and multiple hearings in the ancillary cases that are prevalent to this case.

5. Due to the busy schedules of the parties involved, including co-counsel, the Plaintiff, the co-defendant and opposing counsels, undersigned counsel has been

unable to coordinate the scheduling of the mediation within the time frame provided in the Court Order.

6. Plaintiff is requesting an additional ninety (90) days within which to comply with the Court Order.

7. This motion is being made in good faith and not for the purposes of delay.

8. Since Plaintiff was the party who requested the Mediation and is now requesting an enlargement of time, there is no prejudice suffered by an enlargement of the time frame within which to comply.

9. Undersigned counsel has made a good faith attempt to confer with opposing counsel for Mr. Edwards regarding the enlargement of time.

Wherefore, Plaintiff Jeffrey Epstein requests this Honorable Court grant Plaintiff's motion for enlargement of time.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served, via electronic and US Mail, to all parties on the attached service list, this June 12, 2012.

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