

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80736-CIV-MARRA

JANE DOE #1 and JANE DOE #2,

Petitioners,

vs.

UNITED STATES,

Respondent.

RESPONDENT'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO
FILE RESPONSE TO PETITIONERS' REASSERTION OF OBJECTIONS TO
GOVERNMENT'S ASSERTIONS OF PRIVILEGES

Respondent, by and through its undersigned counsel, files its Unopposed Motion for Enlargement of Time to File Response to Petitioners' Reassertion of Objections to Government's Assertions of Privileges, and states:

1. On September 22, 2014, this Court granted Petitioners' Motion for Ordinary Briefing Schedule and Ordinary Page Limits to Respond to the Government's Privilege Assertions. ■■■. 257 at 3.

2. On October 20, 2014, petitioners filed their Reassertion of Objections to Government's Assertions of Privileges. ■■■. 265.

3. In previous filings, the Government has responded to many of petitioners' objections to the adequacy of the privilege log, the validity of the privileges asserted, including attorney-client; attorney work-product; law enforcement investigative privilege; and the deliberative process privilege. See Respondent's Opposition to Petitioners' Renewed Motion for an Order Directing the U.S. Attorney's Office Not to Withhold Relevant Evidence (■■■. 230), and

Respondent's Opposition to Petitioners' Motion to Compel Production of Document That Are Not Privileged (█. 229).

4. In order to maintain the proper sequence of filed documents, respondent wishes to reassert its responses to petitioners' objections in a single document, so the Court and parties can more easily find the government's response to a particular objection noted by petitioners.

5. Respondent's counsel has been engaged in depositions and discovery in another case, and has not been able to devote full attention to preparing the response to petitioners' Reassertion of Objections to Government's Assertions of Privileges (█. 265). Respondent respectfully requests an enlargement of time, up to and including November 14, 2014, to file its response to petitioners' Reassertion of Objections to Government's Assertions of Privileges.

6. On November 6, 2014, the undersigned conferred by e-mail with petitioners' counsel, to determine their position on this motion. Petitioners' counsel graciously did not oppose this motion.

WHEREFORE, respondent respectfully requests an enlargement of time, up to and including November 14, 2014, to file its response to petitioners' Reassertion of Objections to Government's Assertions of Privileges.

DATED: November 7, 2014

Respectfully submitted,

WILFREDO A. FERRER
UNITED STATES ATTORNEY

By: s/ Dexter A. Lee
DEXTER A. LEE
Assistant U.S. Attorney
Fla. Bar No. 0936693
99 █. 4th Street, Suite 300
Miami, Florida 33132
(305) 961-9320

(305) 371-6421

Fax: (305) 358-2006

E-mail: [REDACTED]

Attorneys for Intervenors