

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2,

Petitioners,

v.

UNITED STATES,

Respondent.

FILED BY: [Signature]
2014 OCT 21 AM 9:31
CLERK OF COURT
S.D. FLORIDA
D.C.

SEALED DOCUMENT

MOTION TO SEAL

Petitioners Jane Doe #1 and Jane Doe #2 (also referred to as “the victims”), through counsel, hereby move to seal their **SUPPLEMENT SUPPORTING RESPONSE TO GOVERNMENT’S MOTION FOR LEAVE TO FILE RELEVANCE OBJECTIONS TO PETITIONER’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS** for the following reasons:

1. This Honorable Court’s Order [DE 255] granted in part Epstein’s Motion for protective Order related to the correspondence.
2. Petitioners seek leave to file this **JANE DOE #1 AND JANE DOE #2’S SEALED SUPPLEMENT SUPPORTING RESPONSE TO GOVERNMENT’S MOTION FOR LEAVE TO FILE RELEVANCE OBJECTIONS TO PETITIONER’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS** under seal, in an abundance of caution, because it discusses material that Epstein has Moved to prevent the disclosure of, and the Court has ordered the victims not to file other similar material in its previous Order [DE 255].

WHEREFORE, Petitioners respectfully request that be sealed until further order of the Court. Alternatively, if the Court denies the instant motion to seal, then Petitioners respectfully request that their **JANE DOE #1 AND JANE DOE #2'S SEALED SUPPLEMENT SUPPORTING RESPONSE TO GOVERNMENT'S MOTION FOR LEAVE TO FILE RELEVANCE OBJECTIONS TO PETITIONER'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS** be filed in the public file and docketed as of today's date, as timely filed.

DATED: October 21, 2014

Respectfully Submitted,



Bradley J. Edwards
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Telephone: [REDACTED]
Facsimile: [REDACTED]
Florida Bar No.: 542075
E-mail: [REDACTED]

and

Paul G. Cassell
Pro Hac Vice
S.J. Quinney College of Law at the
University of Utah
332 S. 1400 E.
Salt Lake City, UT 84112
Telephone: [REDACTED]
Facsimile: [REDACTED]
E-Mail: [REDACTED]

Attorneys for Jane Doe #1 and Jane Doe #2

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on October 20, 2014, on the following using the Court's CM/ECF system:

Dexter Lee
A. Marie Villafaña
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401

[REDACTED]
Fax: [REDACTED]
E-mail: [REDACTED]
E-mail: [REDACTED]

Attorneys for the Government
Roy Black, Esq.
Jackie Perczek, Esq.
Black, Srebnick, Kornspan & Stumpf, P.A.
201 South Biscayne Boulevard, Suite 1300
Miami, FL 33131
Email: [REDACTED]
[REDACTED]

Jay P. Lefkowitz
Kirkland & Ellis, LLP
601 Lexington Avenue
New York, NY 10022
Email: [REDACTED]
[REDACTED]

Martin G. Weinberg, P.C.
20 Park Plaza, Suite 1000
Boston, MA 02116
Email: [REDACTED]
[REDACTED]

Criminal Defense Counsel for Jeffrey Epstein

/s/ Bradley J. Edwards