

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

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

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
_____ /

**JANE DOE #1 AND JANE DOE #2'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO COORDINATE FILING DEADLINE FOR RESPONDING TO MOTION TO
INTERVENE**

COME NOW Jane Doe #1 and Jane Doe #2 (also referred to as "the victims"), by and through undersigned counsel, to move this Court for an extra week of time to respond to the Motion To Intervene of putative intervenors Roy Black, Martin Weinberg, and Jay Lefkowitz.

As the Court is aware, on March 21, 2011, the victims filed four motions in this case, including a substantial motion for "summary judgment" regarding violations of their rights under the Crime Victims' Rights Act (DEs #48, 49, 50, 51). On April 7, 2011, the Government responded to all four motions (DEs #58, 59, 60, 62). The responses total 85 pages, including a 53-page reply to the victim's Motion for Finding of Violations of the Crime Victims' Rights Act.¹ The victims asked for an extra two weeks, until May 2, 2011, to respond to these pleadings, a motion which the Court granted on April 14, 2011 (DE #66).

In addition to the Government's filings on April 7, 2011, on that same date putative intervenors Roy Black, Martin Weinberg, and Jay Lefkowitz filed a motion to intervene (DE #56). The deadline for the victims' response to this motion is now different than the deadline for

¹ To facilitate the Government's response to their motion, counsel for the victims provided a draft of their initial motion to the Government in October 2010.

responding to the Government's pleadings. The arguments that the victims intend to make in opposition to the putative intervenors' motion is interwoven with the arguments that the victims intend to make in responding to the Government's pleadings. Accordingly, the victims request an extension of time to May 2, 2011, so that the deadline for responding to all of the pleadings in this case is the same and so that they can file coordinated pleadings.

For the convenience of the Court, a proposed motion to that effect is attached. The putative intervenors do not oppose the motion.

DATED: April 14, 2011

Respectfully Submitted,

s/ Bradley J. Edwards
Bradley J. Edwards
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Telephone (954) 524-2820
Facsimile (954) 524-2822
Florida Bar No.: 542075
E-mail: brad@pathtojustice.com

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: 801-585-5202
Facsimile: 801-585-6833
E-Mail: cassellp@law.utah.edu

Attorneys for Jane Doe #1 and Jane Doe #2

CERTIFICATE OF SERVICE

The foregoing document was served on April 14, 2011, on the following using the Court's

CM/ECF system:

Dexter Lee
A. Marie Villafaña
Assistant U.S. Attorneys
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401
(561) 820-8711
Fax: (561) 820-8777
E-mail: Dexter.Lee@usdoj.gov
E-mail: ann.marie.c.villafana@usdoj.gov
Attorneys for the Government

Roy Black
Black, Srebnick, Kornspan & Stumpf, P.A.
201 South Biscayne Boulevard
Suite 1300
Miami, FL 33131
Office: (305) 371-6421

Martin G. Weinberg, P.C.
20 Park Plaza
Suite 1000
Boston, MA 02116
Office: (617) 227-3700
Fax: (617) 338-9538

Joseph L. Ackerman, Jr.
Fowler White Burnett PA
777 S. Flagler Drive, West Tower, Suite 901
West Palm Beach, FL 33401
Criminal Defense Counsel for Jeffrey Epstein
(courtesy copy of pleading via U.S. mail)