

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE No. 08-80736-CIV-MARRA/JOHNSON

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

**UNOPPOSED MOTION OF PROPOSED INTERVENORS FOR A
ONE-WEEK EXTENSION OF TIME TO FILE ADDITIONAL BRIEFING**

Following the hearing on August 12, 2011, the Court gave proposed intervenors Black, Weinberg, and Lefkowitz until Friday, August 26 to file supplemental briefing on the issues raised concerning plea negotiations with Jeffrey Epstein. Also following the hearing, the decision was made for Mr. Epstein to file a motion seeking limited intervention so that there are no procedural issues regarding whether the protections and policies relating to Federal Rules of Evidence 410 and 408 should be fully considered by the Court in determining whether to grant or deny the plaintiffs' discovery requests for plea negotiation correspondence between Mr. Epstein's lawyers and the U.S. Attorney's Office. We intended to file Mr. Epstein's motion to intervene by the Court's deadline of August 26, 2011.

We now anticipate that our office will be closed all day Thursday due to Hurricane Irene, and our office may be closed part of the day Wednesday as well. We won't know until after Irene arrives whether our office will be closed on Friday as well. With these time limitations, we will not be able to file our papers as well as Mr. Epstein's motion to intervene and supporting memorandum by the

present deadline of August 26. We have spoke with counsel for Jane Doe 1 and Jane Doe 2 as well as counsel for the government, and all have stated that they do not object to the extension of time requested here, as long as their associated filing deadlines are extended accordingly (the government would have two weeks to respond after we file, Jane Doe 1 and Jane Doe 2 would have two weeks to respond after that, then we would have one week to reply).

Accordingly, we respectfully request an extension of time until Friday, September 2, 2011, to file the supplemental briefing of proposed intervenors Black, Weinberg & Lefkowitz, and to file a motion for limited intervention to assert rights under Rules of Evidence 408 and 410.

We certify that on August 22, 2011, the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF system.

Respectfully submitted,

**BLACK, SREBNICK, KORNSPAN
& STUMPF, P.A.**

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