

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

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

JANE DOES #1 AND #2,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

**UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO MOTION FOR LIMITED INTERVENTION
OF JEFFREY EPSTEIN [DE93] AND SUPPLEMENTAL BRIEFING IN
SUPPORT OF MOTION TO INTERVENE OF ROY BLACK,
MARTIN WEINBERG, AND JAY LEFKOWITZ [DE94]**

The United States of America, by and through the undersigned Assistant United States Attorney, hereby moves for an extension of ten (10) days to file its responses to the Motion for Limited Intervention of Jeffrey Epstein [DE 93] and the Supplemental Briefing in Support of Motion to Intervene of Roy Black, Martin Weinberg, and Jay Lefkowitz [DE 94].

In support thereof, the United States states:

1. The undersigned is counsel of record for the United States in this matter. The undersigned traveled to Bogota, Colombia on the afternoon of September 2, 2011, and was enroute prior to the filing of DE 93 and 94. While in Bogota, the undersigned had only limited access to email and CM/ECF and had no ability to print documents in order to review them.

2. Since returning to the District on the evening of September 11, 2011, the undersigned has had to: (a) prepare for the sentencings of and prepare responses to objections to Presentence

Investigation Reports by Pablo Perez and Rolando Mesa in Court File No. 11-80074-Cr-Marra/Vitunac; (b) prepare a superseding indictment involving a ten-defendant insurance fraud case; (c) prepare a plea agreement in the matter of United States v. Lavelle Hayes; (d) prepare an Agreement to Admit Supervised Release Violation in the matter of United States v. Robert Jason Morgan; and (e) prepare for a contested supervised release violation hearing in the matter of United States v. Philip Furino.

3. The undersigned respectfully requests an additional ten (10) days to prepare a response. This motion is made in good faith and not for purposes of delay. The undersigned has conferred with counsel for the plaintiffs and the intervenors, namely Brad Edwards and Roy Black, who have stated that they have no objection to the granting of this motion.

CONCLUSION

For the foregoing reasons, the United States respectfully requests that the Court grant a ten-day extension of the time for the United States to file its Responses to the Motion for Limited Intervention [DE93] and the Supplemental Briefing in Support of the Motion to Intervene [DE94].

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 16, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. According to the Court's website, counsel for all parties are able to receive notice via the CM/ECF system.

s/A. Marie Villafaña

A. MARIE VILLAFANA

Assistant United States Attorney

SERVICE LIST

Jane Does 1 and 2 v. United States,
Case No. 08-80736-CIV-MARRA/JOHNSON
United States District Court, Southern District of Florida

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