

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

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

JANE DOE #1 and JANDE DOE #2

v.

UNITED STATES
_____ /

**JANE DOE #1 AND JANE DOE #2'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO SUPPLEMENTAL BRIEFING IN SUPPORT OF MOTION TO
INTERVENE BY ROY BLACK ET AL.**

COME NOW Jane Doe #1 and Jane Doe #2 (also referred to as "the victims"), by and through undersigned counsel, to move this Court to allow one extra week (7 days) for them to respond to the Supplemental Briefing in Support of Motion to Intervene of Roy Black, Martin Weinberg, and Jay Lefkowitz (DE 94) and the government response thereto (DE 100). The motion is unopposed.

In support of the motion, the victims note that the briefing schedule set by the Court for the victims to respond to the supplemental pleading and government initially contemplated the victims brief being filed 10 days earlier. As the result of the Government's (unopposed) motion for extension of time, it now appears that the victims' pleading is due on Monday, October 3. Co-counsel for the victims, Paul Cassell, is writing the initial draft of the victims' response. However, he has a long-scheduled trip to Chicago the three days preceding the filing of the brief. His research assistant who is working on the case is also currently ill.

The victims also hope to be able to file a comprehensive response to numerous new issues raised by the Government's pleading and can do so if additional time is granted.

The victims have conferred with counsel for the Government and the counsel for Roy Black, who have stated that they have no objection to the granting of this motion.

CONCLUSION

For all the foregoing reasons, the Court should allow Jane Doe #1 and Jane Doe #2 one extra week, to and including Monday October 10, 2011, to respond to the Supplemental Briefing in Support of Motion to Intervene of Roy Black, Martin Weinberg, and Jay Lefkowitz (DE 94) and the government response thereto (DE 100).

DATED: September 28, 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 September 28, 2011, on the following using the Court's CM/ECF system:

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

Roy Black, Esq.
Jackie Perczek, Esq.
Black, Srebnick, Kornspan & STumpf, P.A.
201 South Biscayne Boulevard
Suite 1300
Miami, FL 33131
Attorneys for Proposed Intervenors Roy Black et al.

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