

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.

JEFFREY EPSTEIN'S MOTION FOR LEAVE TO FILE OVERLONG PLEADING

Jeffrey Epstein seeks leave to file his Omnibus Reply in Support of His Motion For Limited Intervention, which is 20 pages. Undersigned counsel communicated with Paul Cassell, counsel for the plaintiffs, who indicated that he did not object to a 15-page reply, but objects to the additional five pages. We are awaiting response from the government on its position on this motion.

Mr. Epstein has filed one pleading, replying to all the arguments made by both the plaintiffs and the government concerning Mr. Epstein's motion for limited intervention. Even though Mr. Epstein could have filed two separate replies, each consisting of the 10 pages provided by the Rules, we believe that addressing all of the issues in one document rather than piecemeal by breaking them up into two pleadings is more efficient for all involved, including the Court. We communicated with plaintiffs' counsel some weeks ago and advised them of our intention to file one omnibus reply rather than break up the replies into two pleadings. Plaintiffs' counsel responded in writing that they did not have a problem with that.

The issues raised in these and related papers are significant, numerous, and at times complicated. Indeed, the plaintiffs themselves have had to exceed the page limits provided by the

Rules in filing their response to the lawyers' supplemental briefing, and they had the benefit and courtesy of being able to file an *unopposed* motion to exceed the page limit. [DE 105].

We have made every effort to address each issue in an efficient manner, and believe the 20-page omnibus reply is necessary to fully address all the arguments raised by the parties, and in particular the claims made by the plaintiffs that the law does not support the relief requested by Mr. Epstein. A significant portion of the pleading is devoted to citing all the cases that unequivocally rebut the plaintiffs' claims.

Accordingly, we respectfully request that the Court grant Mr. Epstein leave to file his
overlong omnibus reply in support of his motion for limited intervention.

We certify that on October 14, 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.**

201 South Biscayne Boulevard

Suite 1300

Miami, Florida 33131

Office: (305) 371-6421

Fax: (305) 358-2006

By $/S/$

ROY BLACK, ESQ.

Florida Bar No. 126088

JACKIE PERCZEK, ESQ.

Florida Bar No. 0042201

On Behalf of Jeffrey Epstein