

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE #1 and JANE DOE #2,

Petitioners,

vs.

UNITED STATES,

Respondent.

RESPONDENT'S MOTION FOR ENLARGEMENT OF TIME TO FILE
REPLIES AND RESPONSES TO PETITIONERS' RESPONSES AND
MOTIONS FILED ON DECEMBER 5, 2011

Respondent, by and through its undersigned counsel, files its Motion for Enlargement of Time to File Replies and Responses to Petitioners' Responses and Motions filed on December 5, 2011, and state:

1. On December 5, 2011, petitioners filed their Response to Government's Sealed Motion to Dismiss for Lack of Subject Matter Jurisdiction (D.E. 127); Response to Government's Sealed Motion to Stay (D.E. 129); Protective Motion for Remedies (D.E. 128); and Protective Motion to Compel (D.E. 130). Respondent's replies to petitioners' two responses are due on December 15, 2011, while responses to petitioners' two motions are due on December 22, 2011.

2. Counsel for respondents, Marie Villafaña, Eduardo Sanchez, and the undersigned are, or will be, annual leave for the Christmas holiday at various times between December 12, 2011 and January 2, 2012. Respondent respectfully requests an enlargement of time, up to and

including January 6, 2012, to file its replies to petitioners' responses, and its responses to petitioners' two motions.

3. On December 13, 2011, respondent's counsel contacted petitioners' co-counsel, Brad Edwards, to determine petitioners' position on this motion. Mr. Edwards graciously did not oppose the instant motion.

WHEREFORE, respondent respectfully requests an enlargement of time, up to and including January 6, 2012, to file its reply to petitioners' response to respondent's sealed motion to dismiss for lack of jurisdiction (D.E. 127), and respondent's sealed motion to stay (D.E. 129); and to file its response to petitioners' protective motion for remedies (D.E. 128), and protective motion to compel (D.E. 130).

DATED: December 15, 2011

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

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Attorney for Respondent

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 15, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

s/ Dexter A. Lee
DEXTER A. LEE
Assistant U.S. 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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