

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 SECOND 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 Second 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 were due on December 15, 2011, while responses to petitioners' two motions were due on December 22, 2011.

2. On December 15, 2011, respondents moved for an enlargement of time, up to and including January 6, 2012, to file the two responses and two replies. The Court granted respondent's motion on December 15, 2011. D.E. 137.

3. Respondent has begun preparing its responses and replies. However, Assistant U.S. Attorney Marie Villafaña has been occupied for the past several weeks in preparing for an evidentiary hearing scheduled for January 24, 2012, for a motion filed by an incarcerated individual under 28 U.S.C. § 2255. Assistant U.S. Attorney Dexter Lee will be starting a civil trial on Tuesday, January 17, 2012, at 10:00 a.m. M.C. v. United States, Case No. 11-20216-CIV-UNGARO (S.D.Fla.). The responses and replies will be prepared by Assistant U.S. Attorney Eduardo Sanchez, with limited assistance from AUSAs Villafaña and Lee.

4. On January 5, 2012, the undersigned contacted petitioners' counsel to determine their position on the instant motion. Petitioners' counsel graciously did not oppose the instant motion.

WHEREFORE, respondent respectfully requests a second enlargement of time, up to and including January 24, 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: January 6, 2012

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 6, 2012, 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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