

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80736-CIV-MARRA

JANE DOE #1 and JANE DOE #2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

RESPONDENT'S MOTION FOR SEVEN DAY ENLARGEMENT
OF TIME TO COMPLETE RESPONSES TO REQUEST FOR PRODUCTION

Respondent United States of America, by and through its undersigned counsel, files its Motion for Seven Day Enlargement of Time to Complete Responses to Request for Production, and states:

1. On June 19, 2013, the Court issued its Omnibus Order, directing the government to comply the petitioners' request for admissions and request for production within 30 days of the entry of the Order, or July 19, 2013. D.E. 190 at 2.
2. The government will be filing its responses to petitioners' request for admissions on July 19, 2013. Due to the Court of Appeals for the Eleventh Circuit's consideration of the intervenors' motion for stay, the government will not be producing correspondence and other communications between Jeffrey Epstein's attorneys and federal prosecutors. The government will be producing to petitioners the crime victims notifications sought in request for production no. 2. The government will also be producing correspondence and documents between the U.S. Attorney's Office and the Palm Beach County State Attorney's Office and the local police

agencies, as well as other responsive items that are not privileged, or covered by the intervenors' motion for stay at the Eleventh Circuit.

On July 19, 2013, the government will be submitting to the Court, for in camera inspection, approximately 14,000 pages of documents, and an accompanying Privilege Log, which is 24 pages in length.

3. The Office of the Deputy Attorney General has advised that it has requested files from its archives, to determine if they have any responsive documents to request for production no. 8. It expects to receive the archived files next week.

4. On the morning of July 19, 2013, the undersigned received responsive materials from the Department of Justice's Office of Professional Responsibility (OPR). These are potentially responsive to request for production no. 17. These documents will have to be reviewed to determine if any privileges may apply.

5. Because of the number of potential sources of responsive material, and the need to review the material received, the government respectfully requests an enlargement of time of seven (7) days, up to and including July 26, 2013, to complete its response to the request for production.

CERTIFICATE OF CONFERENCE

On July 19, 2013, at approximately 11:49 a.m., Eastern Daylight Time, the undersigned sent an e-mail to petitioners' counsel, Paul Cassell and Brad Edwards, requesting their position on this motion. As of the filing of this motion, no response has been received from the

petitioners' counsel.

Respectfully submitted,

WILFREDO A. FERRER
UNITED STATES ATTORNEY

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ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 19, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, and served the attorneys on the attached Service List by U.S. Mail.

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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