

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 UNOPPOSED MOTION FOR LEAVE OF COURT TO FILE OPPOSITION
TO JANE DOE NO. 1 AND JANE DOE NO. 2'S PROTECTIVE MOTION TO AMEND
PETITION AND ADD JANE DOE NO. 3 AND JANE DOE NO. 4,
IN EXCESS OF TWENTY PAGES

Respondent, by and through its undersigned counsel, files its Unopposed Motion for Leave of Court to File Opposition to Jane Doe No. 1 and Jane Doe No. 2's Protective Motion Pursuant to Rule 15 to Amend Their Petition to Conform to Existing Evidence, and to Add Jane Doe No. 3 and Jane Doe No. 4 as Petitioners, In Excess of Twenty Pages, and state:

1. Respondent United States of America has prepared its Opposition to Jane Doe No.1 and Jane Doe No. 2's Protective Motion Pursuant to Rule 15 to Amend Their Petition to Conform to Existing Evidence and to Add Jane Doe No. 3 and Jane Doe No. 4 as Petitioners (D.E. 311). Respondent's opposition number twenty-four (24) pages, and is attached as Exhibit A.

2. Under S.D.Fla.L.R. 7.1(c)(2), "[a]bsent prior permission of the Court, neither a motion and its incorporated memorandum of law nor the opposing memorandum of law shall exceed twenty (20) pages." Respondent respectfully requests leave of the Court to file its opposition to petitioners' motion, which numbers 24 pages in length.

3. On February 23, 2015, respondent's undersigned counsel contacted petitioners' counsel regarding their position on this motion. Petitioners graciously did not oppose this motion.

WHEREFORE, respondent respectfully requests leave of this Court to file their Opposition to Jane Doe No. 1 and Jane Doe No. 2's Protective Motion Pursuant to Rule 15 to Amend Their Petition to Conform to Existing Evidence and to Add Jane Doe No. 3 and Jane Doe No. 4 as Petitioners, which numbers twenty-four (24) pages.

DATED: February 23, 2015

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

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ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 23, 2015, 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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