

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
_____ /

**UNOPPOSED MOTION BY THE VICTIMS FOR EXTENSION OF TIME
TO FILE REPLY IN SUPPORT OF 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**

COME NOW Jane Doe No. 1 and Jane Doe No. 2 (also referred to as “the current victims”), by and through undersigned counsel, to file this unopposed motion for a short extension of time to file their reply in support of their motion to amend their petition to conform to existing evidence and to add two new victims, Jane Doe No. 3 and Jane Doe No. 4 (the “new victims”) as petitioners.

On February 6, 2015, the current victims filed a 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 (DE 311). On February 23, 2015, the Government filed an opposition to the current victims’ motion (DE 312). The opposition was 25 pages long and raised several complicated issues, including issues surrounding the interplay of the Federal Rules of Criminal Procedure and Civil Procedure and case decisions interpreting statutes of limitation relevant to the motion. Counsel for the victims wish to carefully research issues related to these issues and fully address the points raised by the Government. Counsel for the victims also have several

other significant matters that require their full attention in the next two weeks. Given counsel's schedule, concluding this research and preparing the reply will require additional time. Accordingly, the new victims seek a ten-day extension of time to file their reply until Thursday, March 19, 2015.

Jane Doe No. 1 and Jane Doe No. 2 support this motion. The Government does not oppose this request.

Accordingly, the Court should grant the new victims an extension of time to prepare their reply.

DATED: February 27, 2015

Respectfully Submitted,
/s/ Bradley J. Edwards
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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on February 27, 2015, on the following
using the Court's CM/ECF system:

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