

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

Case No. 9:08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
_____ /

**JANE DOE NO. 1 AND JANE DOE NO. 2'S RESPONSE IN OPPOSITION TO MOTION
FOR LEAVE TO FILE SUPPLEMENT TO REPLY IN SUPPORT OF MOTION FOR
LIMITED INTERVENTION BY ALAN M. DERSHOWITZ**

COME NOW Jane Doe No. 1 and Jane Doe No. 2 (the "current victims"), by and through undersigned counsel, to file this response in opposition to the Motion for Leave to File Supplement to Reply in Support of Motion for Limited Intervention by Alan M. Dershowitz (DE 317). The Court should deny the motion to supplement and use previously-filed pleadings to decide the pending motion to intervene.

On January 5, 2015, Dershowitz filed a motion to intervene (DE 282); on January 21, 2015, the current victims responded (DE 291); on February 2, 2015, Dershowitz replied (DE 306).

Four days after all of the pleading were filed on Dershowitz's motion to intervene, the current victims filed an unrelated pleading. Specifically, on February 6, 2015, the victims filed a reply in support of a motion for Rule 21 joinder in the action (DE 310). That pleading included as an attachment an affidavit from Jane Doe No. 3 (DE 310-1). About five weeks later, Dershowitz filed the pending motion to file a supplement his previously-filed reply. He attached a proposed supplemental pleading attacking Jane Doe's affidavit (DE 317-1).

Dershowitz offers no reason why he waited a full 34 days to supplement his pleading. And his supplement does not cite a single case or argue a single proposition supporting the motion to intervene – but rather simply assaults Jane Doe No. 3. Dershowitz has not shown good cause for filing a supplemental pleading and his motion should be denied.

In the interest of avoiding any further delay due to Dershowitz, the current victims have attached (as Exhibit 1) a proposed response to his supplemental pleading and ask, if the Court grants Dershowitz's motion to file his supplemental pleading, the Court also file and consider the victims' proposed response.

DATED: March 24, 2015

Respectfully Submitted,

/s/ Bradley J. Edwards

Bradley J. Edwards
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Telephone (954) 524-2820
Facsimile (954) 524-2822
E-mail: brad@pathtojustice.com

And

Paul G. Cassell
Pro Hac Vice
S.J. Quinney College of Law at the
University of Utah^{*}
332 S. 1400 E.
Salt Lake City, UT 84112
Telephone: 801-585-5202
Facsimile: 801-585-6833
E-Mail: cassellp@law.utah.edu
Attorneys for Jane Does No. 1, 2, 3 and 4

^{*} This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on March 24, 2015, on the following using the Court's CM/ECF system:

Dexter Lee
A. Marie Villafaña
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401
(561) 820-8711
Fax: (561) 820-8777
E-mail: Dexter.Lee@usdoj.gov
E-mail: ann.marie.c.villafana@usdoj.gov

Attorneys for the Government

Thomas Scott, Fla. Bar No. 149100
COLE, SCOTT & KISSANE, P.A.
Dadeland Centre II
9150 South Dadeland Boulevard, Suite 1400
Miami, Florida 33156
(305) 350-5300
Fax: (305) 373-2294
E-mail: thomas.scott@csklegal.com

Attorneys for Alan Dershowitz

/s/ Bradley J. Edwards