

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 08-80736-Civ-Marra/Matthewman**

JANE DOE #1 AND JANE DOE #2,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

**PARTIES' JOINT MOTION TO CONTINUE SETTLEMENT CONFERENCE
AND FOR EXTENSION OF TIME TO FILE STATUS REPORT**

The parties, by and through undersigned counsel, hereby file this joint motion to continue the settlement conference in this matter and for an extension of time to file a status report on the state of settlement negotiations. In support thereof, the parties state:

1. On May 23, 2016, the parties appeared before the Hon. Dave Lee Brannon for a settlement conference (DE392). Progress was made towards settlement, and it was agreed that the parties would continue working on their own towards settlement and re-convene for a second settlement conference on June 28, 2016 (*id.*). In accordance with that schedule, U.S. Magistrate Judge Brannon ordered the parties to file a joint status report by noon on June 24, 2016 (DE393).

2. The parties have continued to discuss the matter and progress has been made towards settlement. However, additional time is needed to gather all necessary information and to allow adequate time for petitioners' counsel to confer with their client.

3. The parties believe that a short continuance is required to allow further negotiations and conferral and, accordingly, request that the Court re-set the settlement conference and also re-set the time for filing a status report.

4. The parties are available for a settlement conference on July 6, 19, 20, or 21, 2016.

If the Court is unavailable on those dates, additional dates in August are available.

CONCLUSION

For the foregoing reasons, the parties respectfully request that the Court continue the settlement conference currently set for June 28, 2016, and grant a corresponding extension of time to file the parties' joint status report.

For Petitioners:

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

For Respondent:

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

By: s/A. Marie Villafaña

A. MARIE VILLAFANA
Assistant United States Attorney
Florida Bar No. 0018255
500 South Australian Ave, Suite 400
West Palm Beach, FL 33401
Telephone: 561-820-8711
Facsimile: 561-820-8777
ann.marie.c.villafana@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 23, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. According to the Court's website, counsel for all parties are able to receive notice via the CM/ECF system.

s/A. Marie Villafaña

A. MARIE VILLAFANA
Assistant United States Attorney

SERVICE LIST

Jane Does 1 and 2 v. United States,
Case No. 08-80736-CIV-MARRA/MATTHEWMAN
United States District Court, Southern District of Florida

Brad Edwards, Esq.,
Farmer Jaffe Weissing
Edwards Fistos & Lehrman
425 N Andrews Ave Ste 2
Fort Lauderdale, FL 33301-3268
brad@pathtojustice.com
954-524-2820
Fax: 954-524-2822

Paul G. Cassell
S.J. Quinney College of Law at the
University of Utah
332 S. 1400 E.
Salt Lake City, Utah 84112
(801) 585-5202
Fax: (801) 585-6833
casselp@law.utah.edu

Attorneys for Jane Doe # 1 and Jane Doe # 2

Dexter Lee, Esq.
Assistant U.S. Attorney
U.S. Attorney's Office for the Southern
District of Florida
99 N.E. 4th Street
Miami, FL 33131
(305) 961-9320
Fax: (305) 530-7139
dexter.lee@usdoj.gov

A Marie Villafaña
Assistant U.S. Attorney
U.S. Attorney's Office for the Southern
District of Florida
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
(561) 820-8711
Fax: (561) 820-8777
Ann.marie.c.villafana@usdoj.gov

Attorneys for Respondent United States of
America