

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

Case No. 9:08-cv-80736-KAM

JANE DOE 1 AND JANE DOE 2,

Petitioners,

v.

UNITED STATES,

Respondent.

**JANE DOE 1 AND JANE DOE 2'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE REPLY TO GOVERNMENT'S RESPONSE AND OPPOSITION TO
VICTIMS' MOTION FOR PARTIAL SUMMARY JUDGMENT AND RESPONSE TO
GOVERNMENT'S CROSS-MOTION FOR SUMMARY JUDGMENT**

Jane Doe 1 and Jane Doe 2 (also referred to as "the victims"), by and through undersigned counsel, now file this unopposed motion for an extension of time to file a reply/response to the Government's Response and Opposition to the Victims' Motion for Partial Summary Judgment and the Government's Cross-Motion for Summary Judgment (DE 401-2).

As the Court is aware, this is a complex case. Following the filing of the Victims' Statement of Undisputed Materials Facts and Motion for Partial Summary Judgment (DE 361), the Government obtained several extension of time and then, on June 2, 2017, the Government filed a 33-page response to the victims' motion for partial summary judgment and its own cross-motion for summary judgment (DE 401-2). The cross-motion raises nine separate arguments as to why the Government believes it is entitled to summary judgment in this case. In conjunction

with these motions, the Government also filed a 22-page response to the victims' statement of undisputed material facts (DE 407).

The victims' response is currently due on July 21, 2017. Victims' counsel has been working diligently to prepare the victims' response. In researching and working on the response to the Government's motion, the victims have encountered several new issues that were more complicated than initially anticipated. Some of these issues pertain to legislative history associated with the Crime Victims' Rights Act and related subjects that require extensive research. Counsel for the victims also have several other cases that have recently required their attention. As a result of these facts, victims' counsel are not able to complete a fully adequate response under the current deadline.

Accordingly, the victims seek an extension until August 11, 2017, to fully research and brief the important issues raised in the Government's response and motion. This request is not interposed for purposes of delay, but rather to allow full and careful briefing on this potentially dispositive motions. The Government does not oppose the motion and requests that the Court set a date September 15, 2017, for its reply in support of its motion for summary judgment.

For the foregoing reasons, the victims respectfully request that the Court grant a twenty-one day extension to August 11, 2017, to respond to the Government's brief and to reply in support of their motion for summary judgment.

DATED: July 20, 2017

Respectfully Submitted,

/s/ Bradley J. Edwards
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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on July 20, 2017, on the following using the Court's CM/ECF system:

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