

**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
_____ /

**UNOPPOSED MOTION OF JANE DOE 1 AND 2 TO EXCEED PAGE LIMITS IN
THEIR RESPONSE TO THE GOVERNMENT’S MOTION FOR SUMMARY
JUDGMENT**

COME NOW Jane Doe 1 and Jane Doe 2 (hereinafter “the victims”), by and through undersigned counsel, to file this unopposed motion for leave to file a 64-page response to the Government’s motion for summary judgment.

As the Court is aware, this is a complex, long-running case, involving important and precedent setting issues concerning the Crime Victims’ Rights Act. Because of the complexity of the case, the Court granted the victims leave to file a single, sixty-page motion for summary judgment, which included 157 separate assertions of material fact. DE 361 at 8-47. In response, the Government has filed three separate documents: First, the Government has filed a twenty-page Response to Petitioners’ Statement of Undisputed Material Facts in Support of Petitioners’ Motion for Partial Summary Judgment, DE 407; second, the Government has filed its own 8-page Statement of Undisputed Material Facts in Support of Cross-Motion for Summary Judgment, DE 402; and third, the Government filed a 30-page Response and Opposition to Petitioners’ Motion for Partial Summary Judgment and Cross-Motion for Summary Judgment,

DE 401-2. These three documents total 58 pages and raise ten separately-enumerated and argued reasons why the Court should, in the Government's view, grant summary judgment on all of the victims' claims.

S.D.Fla. L.R. 7.1(c)(2) provides that an opposing memorandum of law shall not exceed twenty (20) pages, absent prior permission of the Court. The victims accordingly seek permission from the Court to file an xx-page response. Victims' counsel have worked diligently to keep their response as short as possible. But each of the Government's arguments presents complicated issues requiring a careful response. For example, Part II requires the victims to collect the relevant psychological literature on the response of sex abuse victims to their abuse. Part III requires discussion of a new Act of Congress amending the CVRA in 2015, which the Government argues is relevant to this case.

The vast majority of the Government's arguments were not even discussed in the victims' opening pleading, which contained only a 13-page argument section.

Victims' counsel have conferred with respondent's counsel, and they graciously do not oppose the motion.

WHEREFORE, the victims respectfully request leave of the Court to file a 64-page response to the Government's motion for summary judgment. A proposed order is attached.

DATED: August 11, 2017

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 Doe #1 and Jane Doe #2

^{*} 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 August 11, 2017, 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

/s/ Bradley J. Edwards