

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80736-CIV-MARRA

JANE DOE 1 AND JANE DOE 2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

RESPONDENT'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO
FILE REPLY TO PETITIONERS' RESPONSE TO RESPONDENT'S
CROSS-MOTION FOR SUMMARY JUDGMENT

Respondent, United States of America, by and through its undersigned counsel, files its Unopposed Motion for Enlargement of Time to File Reply to Petitioners' Response to Respondent's Cross-Motion for Summary Judgment, and states:

1. Respondent's reply to petitioners' response to respondent's cross-motion for summary judgment is due on Friday, September 15, 2017.

2. The U.S. Attorney's Office closed on September 7-8, 2017, to prepare for the approach of Hurricane Irma. The Office was closed on September 11-13, 2017, due to the impact of the storm. The Office reopened on September 14, 2017, with many employees still absent due to the effects of the storm.

3. Due to the disruption caused by the storm, respondent respectfully requests an enlargement of time of three weeks, up to and including October 6, 2017, to file its reply to petitioners' response to respondent's cross-motion for summary judgment. On September 14, 2017, the undersigned counsel contacted petitioners' counsel, Brad Edwards, Esq., regarding

petitioners' position on the instant motion. Mr. Edwards graciously did not oppose respondent's motion.

WHEREFORE, respondent respectfully requests an enlargement of time, up to and including October 6, 2017, to file its reply to petitioners' response to respondent's cross-motion for summary judgment.

DATED: September 15, 2017

Respectfully submitted,

BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY

By: s/ Dexter A. Lee
DEXTER A. LEE
Assistant U.S. Attorney
Fla. Bar No. 0936693
99 N.E. 4th Street, Suite 300
Miami, Florida 33132
(305) 961-9320
Fax: (305) 530-7139
E-mail: dexter.lee@usdoj.gov

ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 15, 2017, the foregoing was filed with the Clerk of the Court and served on counsel on the attached service list using CM/ECF.

/s/ Dexter A. Lee
Dexter A. Lee
Assistant United States Attorney

SERVICE LIST

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

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

Attorneys for Jane Doe 1 and Jane Doe 2

Jacqueline Perczek
BLACK SREBNICK KORNSPAN & STUMPF
201 S. Biscayne Boulevard, Suite 1300
Miami, FL 33131
Tel: (305) 371-6421; Fax: 305-358-2006
Email: Pleading@royblack.com

Roy E. Black
BLACK SREBNICK KORNSPAN & STUMPF
201 S. Biscayne Boulevard, Suite 1300
Miami, FL 33131
Tel: (305) 371-6421; Fax: 305-358-2006
Email: Rblack@royblack.com

Attorneys for Intervenor Jeffrey Epstein

Dexter A. Lee
Assistant United States Attorney
99 N.E. 4th Street, Suite 300
Miami, Florida 33132
Tel: (305) 961-9320; Fax: (305) 530-7139
E-mail: dexter.lee@usdoj.gov

A. Marie Villafaña
Assistant United States Attorney
500 S. Australian Avenue, Suite 400
West Palm Beach, Florida 33401
Tel: (561) 820-8711; Fax: (561) 820-8777
E-mail: ann.marie.c.villafana@usdoj.gov

Eduardo I. Sánchez
Assistant United States Attorney
Florida Bar No. 877875
99 N.E. 4th Street
Miami, Florida 33132
Tel: (305) 961-9057; Fax: (305) 536-4676
Email: eduardo.i.sanchez@usdoj.gov

Attorneys for the United States