

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.

_____ /

JEFFREY EPSTEIN,

Intervenor.

_____ /

**INTERVENOR JEFFREY EPSTEIN'S UNOPPOSED MOTION FOR A
FOURTEEN (14) DAY ENLARGEMENT OF TIME TO RESPOND TO
PETITIONERS' SUBMISSION ON PROPOSED REMEDIES**

Intervenor JEFFREY EPSTEIN, through undersigned counsel, respectfully moves the Court for an Order granting him an additional fourteen (14) days, until Monday, July 8, 2019, to file his response to Petitioners Jane Doe 1 and Jane Doe 2's Submission on Proposed Remedies (DE 458). The government has advised that it does not object to this request. Petitioners have advised that they do not object so long as the other deadlines remain intact. In support, Intervenor states as follows:

1. On May 13, 2019, this Court entered an Order (DE 454) setting a briefing schedule for the Petitioners, the government, and the Intervenor to file submissions regarding proposed remedies in this case.

2. Petitioners' submission was due on June 12, 2019, but they filed it on May 23, 2019, twenty days ahead of the deadline. (DE 458). Petitioners' submission seeks nineteen categories of remedies.
3. Under the Court's scheduling Order (DE 454:2), Mr. Epstein's response is now due within thirty days of May 23, 2019, or on or before June 22, 2019.
4. Undersigned counsel have been working diligently in preparing Mr. Epstein's response to Petitioners' submission. However, given the length of Petitioners' submission, the number and nature of the remedies sought, and the stakes involved, as well as travel schedules and other responsibilities of undersigned counsel, Mr. Epstein estimates that he will need an additional fourteen (14) days, **until July 8, 2019**,¹ to file his response.
5. A filing by Mr. Epstein on or before July 8, 2019, would still be within the initial deadline set by the Court had Petitioners used the entire thirty days to file their submission.
6. This request is being made so that Mr. Epstein's counsel can fully research the legal issues and effectively represent Mr. Epstein, not for purposes of delay.
7. Counsel for Mr. Epstein (Martin G. Weinberg, Esq.) communicated with AUSA Jill E. Steinberg, counsel for the government, who advises that the government does not object to this requested enlargement of time. Counsel for Mr. Epstein (Scott Link, Esq.) has communicated with Bradley J. Edwards, Esq., counsel for

¹ Inasmuch as the fourteenth day lands on Saturday, July 6, 2019, the deadline would be Monday, July 8, 2019. See Fed.R.Civ.P. 6(a)(1)(C).

the Petitioners, who advises that the Petitioners do not oppose the requested enlargement so long as the other deadlines remain in place.²

8. Accordingly, Mr. Epstein respectfully requests an Order granting him an enlargement of time until July 8, 2019, to respond to Petitioners' submission on remedies. Attached as Exhibit A is a proposed order for the Court's consideration.

Respectfully submitted,

/s/Roy Black

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² In the event the government does not seek additional time, and files its submission on or before the current deadline, Mr. Epstein, in one submission, would also address any issues raised by the government. (DE 454:2, ¶4).

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3rd day of June 2019, 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 and intervenors are able to receive notice via the CM/ECF system.

/s/Jackie Perczek
Jackie Perczek