

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 09-80591-MARRA/JOHNSON

JANE DOE No. 101,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant,

/

**DEFENDANT JEFFREY EPSTEIN'S MOTION FOR EXTENSION
OF TIME IN WHICH TO FILE A REPLY TO PLAINTIFF JANE DOE 101'S RESPONSE
TO DEFENDANT'S MOTION TO DISMISS AMENDED COMPLAINT**

Defendant, Jeffrey Epstein, (hereinafter "Epstein") by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to reply to Plaintiff, Jane Doe 101's Response to Defendant, Epstein's Motion to Dismiss Amended Complaint [DE 56] dated June 26, 2009. Defendant seeks an extension until December 15, 2009, to file his reply. As good cause in support of granting the motion, Defendant states:

1. On May 1, 2009, Plaintiff filed an Amended Complaint [DE 9].
2. On May 26, 2009, Defendant filed a Motion to Dismiss Amended Complaint [DE 29].
3. On June 26, 2009, Plaintiff filed her Response to Defendant's Motion to Dismiss Amended Complaint [DE 56].

Doe 101 v. Epstein
Page 2

4. The parties continue to work together to find a resolution in this case and are close to a resolution. In addition, parties have agreed to numerous extensions while negotiating a resolution.

5. The implosion of the Rothstein Rosenfeldt & Adler, PA firm has raised certain questions for which defense counsel will request answers/information from Plaintiff's counsel regarding the Rothstein scheme/scandal prior to final resolution.

6. The requested extension is fair and reasonable under the circumstances as it will provide time to allow the Defendant, EPSTEIN, to fully and adequately respond.

7. As certified below, counsel for Defendant conferred with counsel for Plaintiff, and Plaintiff's counsel is not in agreement with the requested extension at this time.

WHEREFORE Defendant respectfully requests that this Court enter an Order granting an extension until December 15, 2009, to file a Reply to Plaintiff's Response to Defendant's Motion to Dismiss Amended Complaint.

Local Rule 7.1 Statement

Counsel for the movant conferred by correspondence with counsel for the Plaintiff and Counsel for Plaintiff is not in agreement with the requested extension until December 15, 2009 for Defendant to respond to Plaintiff's Complaint.

Robert D. Critton Jr., Esq.
Attorney for Defendant

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being

Doe 101 v. Epstein
Page 3

served this day on all counsel of record identified on the following Service List in the manner specified by CM/ECF on this 2nd day of December, 2009

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Respectfully submitted,

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