

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE II)	CASE NO.: 09-80469-CIV-MARRA
)	
Plaintiff,)	
)	
vs.)	
)	
JEFFREY EPSTEIN,)	
and SARAH KELLEN,)	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR DEFAULT AGAINST DEFENDANT SARAH KELLEN

Plaintiff, JANE DOE II, moves for a default against Defendant SARAH KELLEN, and would show in support:

1. Defendant KELLEN has been avoiding service as detailed in the Affidavit of Service of Joseph Sanchez, attached as **Exhibit 1**.
2. Mr. Sanchez effected service on Defendant KELLEN in a manner authorized by New York State law, and Defendant KELLEN has failed to timely answer the complaint or otherwise respond thereto.
3. Defendant KELLEN is aware of this action and has in fact traveled to visit with Defendant EPSTEIN at the Palm Beach County Jail on several occasions.

WHEREFORE, Plaintiff respectfully requests that this Court enter a default against Defendant KELLEN.

Respectfully submitted,

BY: s/ Isidro M. Garcia
ISIDRO M. GARCIA
Florida Bar No. 437883
GARCIA LAW FIRM, P.A.
224 Datura Street, Suite 900
West Palm Beach, FL 33401
Telephone: (561) 832-7732
Telecopier: (561) 832-7137
e-mail: isidrogarcia@bellsouth.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished **VIA ECM TRANSMISSION** to: Robert D. Critton, Esq. and Michael Pike, Esq., BURMAN CRITTON LUTTIER & COLEMAN, 515 N. Drive, Suite 400, West Palm Beach, Florida 33401 this 12th day of June, 2009.

BY: s/ Isidro M. Garcia
ISIDRO M. GARCIA