

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 9:10-cv-81111-WPD

M.J.,

Plaintiff,

vs.

JEFFREY EPSTEIN and
SARAH KELLEN,

Defendant.

**DEFENDANT JEFFREY EPSTEIN'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO PLAINTIFF'S MOTION FOR A PROTECTIVE ORDER
BARRING DIRECT OR INDIRECT CONTACT BY EPSTEIN AND MOTION FOR
PRESERVATION OF EVIDENCE RELATING TO CORRESPONDENCE WITH U.S.
ATTORNEY'S OFFICE**

Defendant Jeffrey Epstein, by and through undersigned counsel, respectfully moves for a ten (10) - day enlargement of time in which to respond to Plaintiff's Motion for a Protective Order Barring Direct or Indirect Contact by Epstein (D.E. 16) and Motion for Preservation of Evidence Relating to Correspondence with U.S. Attorney's Office (D.E. 17) and states as follows:

1. On October 11, 2010, Plaintiff filed a Motion for a Protective Order Barring Direct or Indirect Contact by Epstein (D.E. 16) and a Motion for Preservation of Evidence Relating to Correspondence with U.S. Attorney's Office (D.E. 17). Defendant's response to the foregoing motions is presently due on November 29, 2010.

2. The parties have recently been engaging in discussions to resolve the foregoing pending motions.

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3. The parties require an additional ten (10) days in which to resolve all matters pertaining to the pending motions.

4. In order to facilitate the resolution of the foregoing motions, and to avoid unnecessary attorney's fees and utilization of judicial resources, Defendant respectfully requests that this Court grant a 10-day enlargement of time for Defendant to respond to the above-listed motions.

5. Pursuant to Local Rule 7.1, counsel for Defendant has conferred with opposing counsel, Gary Farmer, who has graciously advised that Plaintiff has no objection to the extension requested herein.

6. This enlargement is sought for the reasons stated and will not prejudice any party.

WHEREFORE, Defendant Jeffrey Epstein respectfully requests that a 10-day enlargement of time be granted and that the Court grant such other and further relief as deemed necessary and proper.

Respectfully submitted,

s/Lilly Ann Sanchez

Lilly Ann Sanchez

Fla. Bar No. 195677

las@fowler-white.com

Christopher E. Knight

Fla. Bar No. 607363

cknight@fowler-white.com

Helaine S. Goodner

Fla. Bar No. 462111

hgoodner@fowler-white.com

FOWLER WHITE BURNETT P.A.

Espirito Santo Plaza, 14th Floor

1395 Brickell Avenue

Miami, Florida 33131-3302

Telephone: (305) 789-9200

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Facsimile: (305) 789-9201

Counsel for Defendant Jeffrey Epstein

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2010, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Lilly Ann Sanchez

Lilly Ann Sanchez

Fla. Bar No. 195677

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SERVICE LIST

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United States District Court, Southern District of Florida

Bradley J. Edwards

brad@pathtojustice.com

Farmer, Jaffe, Weissing, Edwards

Fistos & Lehrman, PL

425 North Andrews Avenue, Suite 2

Fort Lauderdale, Florida 33301

Telephone: (954) 524-2820

Facsimile: (954) 524-2822

Attorneys for Plaintiff M.J.

Served via CM/ECF