

**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.

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

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,

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

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*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

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

**SERVICE LIST**  
*M.J. v. Epstein*  
**Case No. 9:10-cv-81111-WPD**  
**United States District Court, Southern District of Florida**

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