

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 09-80656-MARRA/JOHNSON

JANE DOE No. 102,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant,

**DEFENDANT JEFFREY EPSTEIN'S UNOPPOSED MOTION FOR EXTENSION
OF TIME IN WHICH SERVE RESPONSIVE PLEADING TO COMPLAINT**

Defendant, Jeffrey Epstein (hereinafter "Epstein"), by and through his undersigned attorneys, respectfully moves this Court for an extension of time in which to respond to Complaint dated, May 1, 2009 [DE 1]. Defendant seeks an extension until October 30, 2009, to file his response. As good cause in support of granting the motion, Defendant states:

1. On May 1, 2009 Plaintiff filed a Complaint [DE 1]. Defendant's response would be due on August 20, 2009, as previously agreed upon.
2. The parties continue to work together to potentially resolve this case.
3. 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.
4. As certified below, counsel for Defendant conferred with counsel for Plaintiff, and Plaintiff's counsel is in agreement with the requested extension.

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WHEREFORE Defendant respectfully requests that this Court enter an Order granting an extension until October 30, 2009, to file a response to Plaintiff's Complaint.

Local Rule 7.1 Statement

Counsel for the movant conferred by telephone and correspondence with counsel for the Plaintiff and Counsel for Plaintiff is in agreement with the requested extension until October 30, 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 served this day on all counsel of record identified on the following Service List in the manner specified by CM/ECF on this 15th day of October, 2009

Robert C. Josefsberg, Esq.
Katherine W. Ezell, Esq.
Podhurst Orseck, P.A.
25 West Flagler Street, Suite 800
Miami, FL 33130
305 358-2800
Fax: 305 358-2382
rjosefsberg@podhurst.com
kezell@podhurst.com
Counsel for Plaintiff

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
561-659-8300
Fax: 561-835-8691
jagesq@bellsouth.net
Counsel for Defendant Jeffrey Epstein

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Respectfully submitted,

By: 

ROBERT D. CRITTON, JR., ESQ.

Florida Bar No. 224162

rcrit@bclclaw.com

MICHAEL J. PIKE, ESQ.

Florida Bar #617296

mpike@bclclaw.com

BURMAN, CRITTON, LUTTIER & COLEMAN

515 N. Flagler Drive, Suite 400

West Palm Beach, FL 33401

561/842-2820 Phone

561/515-3148 Fax

(Counsel for Defendant Jeffrey Epstein)