

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

**CASE NO.: 08-80804-CIV-MARRA/JOHNSON**

**JANE DOE, a/k/a,  
JANE DOE NO. 1,**

**Plaintiff,**

**vs.**

**JEFFREY EPSTEIN, HALEY  
ROBSON, and SARAH KELLEN,**

**Defendants.**

---

**PLAINTIFF'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE  
RESPONSE TO DEFENDANT EPSTEIN'S MOTION TO DISMISS**

Plaintiff Jane Doe moves, pursuant to Rule 7.1(A) of the Local Rules of the United States District Court for the Southern District of Florida, for an enlargement of time to respond to Defendant Epstein's Motion to Dismiss until fifteen days after the Court rules on her motion to remand.

1. Defendants removed this action to federal court on July 21, 2008. (DE 1).
2. Plaintiff filed a motion to remand on August 18, 2008. (DE 11). It is Plaintiff's contention that the Court lacks subject matter jurisdiction over this case because it does not involve a federal question or parties with complete diversity of citizenship.
3. If this action was improperly removed and is, consequently, remanded to state court for lack of jurisdiction, it would be a waste of time and resources for Plaintiff to respond to and the Court to consider Defendant Epstein's motion to dismiss.

WHEREFORE, Plaintiff respectfully requests the Court grant her motion for an enlargement of time to respond to Defendant Epstein's motion to dismiss until fifteen days after the Court rules on her motion to remand.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1.A.3**

On September 18, Plaintiff's counsel conferred with Robert Critton, counsel for Defendant Epstein; Bruce Reinhart, counsel for Defendant Kellen; and Jason McGrath, counsel for Defendant Robson, in a good faith effort to resolve the issues raised in this motion. Each attorney represented that his client does not oppose Plaintiff's motion.

s/ Spencer T. Kuvin  
Spencer T. Kuvin (Florida Bar Number 089737)

**Certificate of Services**

I hereby certify that on September 18, 2008, 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/ Spencer T. Kuvin  
Spencer T. Kuvin (Florida Bar Number 089737)  
Attorney E-Mail Address:  
LEOPOLD~KUVIN, P.A.  
2925 PGA Blvd., Suite 200  
Palm Beach Gardens, FL 33410  
Telephone: (561) 515-1400  
Facsimile: (561) 515-1401  
Counsel for Plaintiff Jane Doe

**SERVICE LIST**

**Doe v. Epstein, et. al.**  
**CASE NO: 08-80804-Civ-MARRA/JOHNSON**  
**United States District Court, Southern District of Florida**

Robert Critton, Esq.  
Email: [rcrit@bclclaw.com](mailto:rcrit@bclclaw.com)  
Michael Pike, Esq.  
Email: [mpike@bclclaw.com](mailto:mpike@bclclaw.com)  
Burman, Critton, Luttier & Coleman, LLP  
515 N. Flagler Drive, Suite 400  
West Palm Beach, FL 33401  
Phone: (561) 842-2820  
Fax: (561) 515-3148  
*Counsel for Jeffrey Epstein*  
Served via CM/ECF

Guy Alan Lewis, Esq.  
Email: [lewis@lewistein.com](mailto:lewis@lewistein.com)  
Michael R. Tein, Esq.  
Email: [tein@lewistein.com](mailto:tein@lewistein.com)  
Lewis Tein  
3059 Grand Avenue, Suite 340  
Coconut Grove, FL 33133  
Phone: (305) 442-1101  
Fax: (305) 442-6744  
*Counsel for Jeffrey Epstein*  
Served via CM/ECF

Bruce E. Reinhart, Esq.  
Bruce E. Reinhart, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401  
Phone: (561) 202-6360  
Fax: (561) 828-0983  
*Counsel for Sarah Kellen*  
Served via U.S. Mail, postage prepaid

Douglas M. McIntosh, Esq.  
[dmcintosh@mspcesq.com](mailto:dmcintosh@mspcesq.com)  
Jason A. McGrath, Esq.  
[jmcgrath@mspcesq.com](mailto:jmcgrath@mspcesq.com)  
McIntosh, Sawran, Peltz & Cartaya, P.A.  
Centurion Tower, Suite 1110

1601 Forum Place  
West Palm Beach, FL 33401  
Phone: (561) 682-3202  
Fax: (561) 682-3206  
*Counsel for Haley Robson*  
Served via CM/ECF