

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.

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Doe v. Epstein, et. al.
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United States District Court, Southern District of Florida

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