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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

04 CV 10108

JANE DOE I, JANE DOE II AND
JANE DOE III,

Plaintiffs,

v.

EMMANUEL CONSTANT,
a.k.a. TOTO CONSTANT,

Defendant.

Civil Action No. _____

**PLAINTIFFS' *EX PARTE* MOTION
FOR LEAVE TO FILE COMPLAINT AS
PSEUDONYMOUS PLAINTIFFS**

Plaintiffs Jane Doe I, Jane Doe II and Jane Doe III, by and through counsel, hereby move for leave to file their Complaint using pseudonyms. Because of the nature of the allegations in Plaintiffs' Complaint, Jane Doe I, Jane Doe II and Jane Doe III justifiably fear acts of reprisal that could inflict severe physical and mental harm on them and their families. In support of this motion, Plaintiffs rely on the accompanying memorandum and the Declaration of Jennifer Green, attached hereto.

For these reasons and such other reasons as may appear just to the Court, Plaintiffs requests that their motion for leave to file the Complaint under pseudonyms be granted.

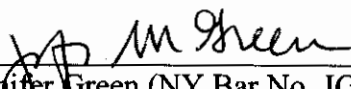
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Dated: December 21, 2004

Respectfully submitted,


Jennifer Green (NY Bar No. JG-3169)
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