

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
CASE NO: 1:10-cv-21951-Ungaro/Simonton

Jesus Cabrera Jaramillo, in his individual
Capacity, and in his capacity as the personal
Representative of the estate of Alma Rosa
Jaramillo,

Jane Does, in her individual capacity, and in
her capacity as the personal representative of
the estate of Eduardo Estrada, and

John Doe, in his individual capacity,
Plaintiffs,

v.

CARLOS M. JIMENEZ NARANJO,
Defendant.

MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING;
MOTION FOR ABATEMENT OF ORDER SETTING INITIAL
PLANNING AND SCHEDULING CONFERENCE

The defendant, CARLOS M. JIMENEZ NARANJO, ("Jimenez"), by and through the undersigned, respectfully requests an extension of 60 days for temporary counsel to petition the Department of Treasury, Office of Foreign Assets Control for approval and a license to be retained by the defendant. Jimenez also asks that he granted this same extension of time to file a responsive pleading to the complaint and to comply with the Order of June 24, 2010 setting the initial planning and scheduling conference. In support of these motions, Jimenez states as follows:

The defendant who is incarcerated at FDC-Miami was served with the complaint on July 13, 2010.

Jimenez would like to retain Hugo Rodriguez and Associates to defend this cause of action.

In February, 2008 Jimenez was designated a Specially Designed Narcotics Trafficker under the Foreign Narcotics Kingpin Designation Act. *50 U.S.C §§ 1601 et. seq., 50 U.S.C 1701 et. seq., Executive Order 12978, 31 C.F.R. 501 and 536.*

As a result, all assets are frozen by the United States government and American citizens are forbidden from contracting with or doing business with Jimenez.

Accordingly, any American citizen or entity must apply for and receive permission, a license from the United States Department of Treasury, Office of Foreign Assets Control, and ("OFAC") prior to contracting with Jimenez. *31 C.F.R. 501 & 536.506(b).*

If granted a 60 day extension of time, the Rodriguez Firm will apply for the OFAC license in order to be retained by Jimenez. Without an OFAC license Jimenez cannot be represented by counsel.

Further, Jimenez asks that he not be required to respond to the complaint and that the order of June 24, 2010 setting deadlines and a scheduling conference be abated until Jimenez has been able to retain counsel. It is anticipated that it will take no less than 60 for the petition process with OFAC to be completed and approved.

An effort to contact plaintiff's counsel prior to submission of this motion was unsuccessful.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this pleading will be provided to all interested parties through the Court's CM/ECF system.

Respectfully submitted,

/s/
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