

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO: 1:10-cv-21951 Ungaro/Simonton

**Jesús Cabrera Jaramillo, in his individual
capacity, and in his capacity as the personal
representative of the estate of Alma Rosa
Jaramillo,**

**Jane Doe, 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 MARIO JIMÉNEZ NARANJO, also
known as “Macaco,” “El Agricultor,” “Lorenzo
González Quinchía,” and “Javier Montañez,”**

Defendant.

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANT
TO FILE RESPONSIVE PLEADING AND ABATE ORDER SETTING INITIAL
PLANNING AND SCHEDULING CONFERENCE**

TO THE UNITED STATES COURT FOR THE SOUTHERN DISTRICT OF FLORIDA:

Plaintiffs Jesús Cabrera Jaramillo, Jane Doe, and John Doe (collectively “Plaintiffs”) and Defendant Carlos Mario Jiménez Naranjo (“Defendant”) (jointly, the “Parties”), by and through their undersigned counsel, hereby enter into the following stipulation:

WHEREAS, on July 30, 2010, this Court granted Defendant’s Motion for Extension of Time to File a Responsive Pleading and for Abatement of Order Setting Initial Planning and Scheduling Conference to allow Defendant’s temporary counsel (“Counsel for Defendant”) time to obtain a license from the United States Department of Treasury’s Office of Foreign Assets Control (“OFAC”) regarding his representation of the Defendant in this matter;

WHEREAS, pursuant to the Court's Order on July 30, 2010, the Defendant's Response to the Complaint is due on or before September 23, 2010, and the Parties are required to file a Joint Planning and Scheduling Report by October 1, 2010 and to conduct a Planning and Scheduling Conference with the Court on October 15, 2010 at 10:00 a.m.;

WHEREAS, on August 3, 2010, Counsel for Defendant submitted his application to OFAC for a license to provide legal services and be retained by the Defendant;

WHEREAS, on September 18, 2010, Counsel for Defendant informed the Court that his application to OFAC is still pending and that OFAC has informed him that the application process generally takes 90 days or longer and that no legal services can be provided to the Defendant without OFAC's approval.

WHEREAS, the parties, through their respective counsel, conferred and agreed to a forty-five (45) day extension on all deadlines in the Court's July 30, 2010 order, or any date thereafter at the convenience of the Court.

NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned as follows:

All deadlines in the Court's July 30, 2010 order shall be vacated and extended by forty-five (45) days, or any date thereafter at the convenience of the Court. Counsel for Defendant shall file notice within three days upon the receipt of any communication from OFAC regarding the status of the application.

Dated: September 22, 2010

By: /s/ Julie C. Ferguson
Julie C. Ferguson

Attorney for Plaintiffs
JESÚS CABRERA JARAMILLO, JANE
DOE, AND JOHN DOE

Dated: September 22, 2010

By: /s/ Hugo A. Rodriguez
Hugo A. Rodriguez

Attorney for Defendant
CARLOS MARIO JIMÉNEZ NARANJO

IT IS SO ORDERED.

Dated: _____, 2010

THE HONORABLE URSULA UNGARO

SIGNATURE ATTESTATION

I, Julie C. Ferguson, am the ECF User whose identification and password are being used to file this STIPULATION EXTENDING TIME FOR DEFENDANT TO FILE RESPONSIVE PLEADING AND ABATE ORDER SETTING INITIAL PLANNING AND SCHEDULING CONFERENCE. In compliance with CM/ECF Administrative Procedures 3J.3, I hereby attest that Hugo A. Rodriguez has concurred in this filing.

Dated: September 22, 2010

By: /s/ Julie C. Ferguson
Julie C. Ferguson

Attorney for Plaintiffs
JESÚS CABRERA JARAMILLO, JANE
DOE, AND JOHN DOE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 22, 2010, 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 below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Julie C. Ferguson
JULIE C. FERGUSON