

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

**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

**John Doe, in his individual capacity, and in
his capacity as the personal representative of
the estate of Eduardo Estrada,**

Plaintiffs,

v.

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

Defendant.

Case No.: 1:10-cv-21951-EGT

**Hon. Ursula Ungaro
Hon. Edwin G. Torres**

REQUEST FOR ORAL ARGUMENT

**PLAINTIFFS’ REQUEST FOR ORAL ARGUMENT ON OPPOSITION TO
DEFENDANT’S MOTION TO DISMISS AMENDED COMPLAINT**

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Pursuant to Local Rule 7.1(b)(2), Plaintiffs Jesús Cabrera Jaramillo, Jane Doe, and John Doe hereby respectfully request oral argument on their Opposition to Defendant's Motion to Dismiss. This case and the motion to dismiss raise novel questions of law regarding application of the Alien Tort Statute, 28 U.S.C. §1350, following the U.S. Supreme Court's recent decision in *Kiobel v. Royal Dutch Petroleum Co.*, 133 S.Ct. 1659 (2013). Given the importance of these questions to the determination of this case and the complexity of this area of law, Plaintiffs believe that the Court's decision-making process would be significantly aided by oral argument. Plaintiffs estimate one hour will be necessary for argument.

Dated: November 12, 2013

Respectfully Submitted,

By: /s/ Julie C. Ferguson

Julie C. Ferguson, Florida State Bar #93858
CARLTON FIELDS
Miami Tower
100 S.E. Second ST., Ste. 4200
Telephone: (305) 539-7249
Facsimile: (305) 530-0055
Email: jferguson@carltonfields.com

Leo P. Cunningham, California State Bar #121605
Charlene Koski, Washington State Bar #93858
WILSON SONSINI GOODRICH & ROSATI P.C.
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100
Email: lcunningham@wsgr.com
Email: ckoski@wsgr.com

L. Kathleen Roberts, California State Bar #233481
CENTER FOR JUSTICE AND
ACCOUNTABILITY
870 Market Street, Suite 682
San Francisco, CA 94102
Telephone: (415) 544-0444
Facsimile: (415) 544-0456
Email: kroberts@cja.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Plaintiffs' Request for Oral Argument on Opposition to Defendant's Motion to Dismiss Amended Complaint was served by CM/ECF on November 12, 2013, on counsel or parties of record on the service list.

Hugo A. Rodriguez, Esq.
1210 Washington Avenue, Suite 245
Miami Beach, FL 33139
Email: hugolaw@aol.com

/s/ Julie C. Ferguson

JULIE C. FERGUSON