

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

Case No. 20-cv-23787-CIV-CANNON

WILLIAM H. CLAFLIN, IV, *et al.*,

Plaintiffs,

vs.

LAFARGEHOLCIM LTD, *et al.*,

Defendants.

**JOINT STIPULATION AND PROPOSED ORDER REGARDING EXTENSION OF
TIME TO RESPOND TO THE COMPLAINT**

WHEREAS on September 11, 2020, William H. Claflin, IV; Josephine C. Horan; Patricia M. Claflin; Edward A. Claflin; Elaine Y. Alexander; John K. Spring, Jr.; Helen S. Montero; William C. Spring; Susan K. Spring; David G. Witter; Malcolm G. Witter; Dean Witter III; Helen C. Witter; Katharine C. Weeks; Katharine W. White; Martha W. Sinclair; John W. Weeks Jr.; David C. Weeks; Sinclair Weeks; Stephen D. Weeks; Robert F. Weeks; Estate of Anne C. Allen; Estate of Helen C. Spring; Estate of John W. Weeks; and Estate of Prentice W. Claflin (collectively, the “Plaintiffs”) filed a complaint (the “Complaint”) against LafargeHolcim Ltd; Inversiones Ibersuizas S.A.; Holcim Trading SA (F/K/A) Union Maritima Internacional SA; de Ruitter Ouderlande B.V.; Las Pailas de Cemento S.A.U.; and Unknown Subsidiary of the LafargeHolcim Group (collectively, the “Defendants”);

WHEREAS this joint stipulation will promote the efficient and orderly administration of justice;

WHEREAS, the Plaintiffs and Defendant LafargeHolcim Ltd have scheduled on April

22, 2021 a mediation before the Hon. Layn R. Phillips of Phillips ADR Enterprises;

WHEREFORE, the Plaintiffs and Defendant LafargeHolcim Ltd, through their undersigned counsel, hereby agree, stipulate, and respectfully request that the Court enter an Order as follows:

LafargeHolcim Ltd's response to the Complaint is due on May 21, 2021, subject to any such further extensions as may be agreed upon by the parties or ordered by the Court.

Respectfully submitted,

Dated: March 23, 2021

**ROIG, TUTAN, ROSENBERG, MARTIN
& BELLIDO, P.A**

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Counsel for Defendant LafargeHolcim Ltd

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of March, 2021, I electronically filed and served the foregoing with the Clerk of the Court by using the CM/ECF.

By: /s/Nelson C. Bellido
Nelson C. Bellido

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LAFARGEHOLCIM LTD, *et al.*,

Defendants.

**[PROPOSED] ORDER REGARDING EXTENSION OF TIME TO RESPOND
TO THE COMPLAINT**

THIS CAUSE came before the Court upon Joint Stipulation Regarding Extension of Time to Respond to the Complaint of the Plaintiffs and Defendant LafargeHolcim Ltd and, upon due consideration and for good cause shown,

IT IS HEREBY ORDERED as follows:

LafargeHolcim Ltd's response to the Complaint shall be due May 21, 2021, subject to any such further extensions as may be agreed upon by the parties or ordered by the Court.

Dated: _____, 2021.

AILEEN M. CANNON
UNITED STATES DISTRICT JUDGE