

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
Case No. 9:03-81110-Civ-Hurley/Hopkins**

MAUREEN STEVENS, as personal	)
representative of the Estate of ROBERT	)
STEVENS, deceased, and on behalf of	)
MAUREEN STEVENS, individually,	)
NICHOLAS STEVENS, HEIDI HOGAN,	)
and CASEY STEVENS, survivors,	)
	)
Plaintiff,	)
	)
vs.	)
	)
UNITED STATES OF AMERICA,	)
	)
Defendant.	)
	/

**JOINT MOTION TO STAY DEADLINES**  
**PENDING FINALIZATION OF SETTLEMENT**

Defendant United States of America and Plaintiffs (“the parties”) respectfully move this Court to immediately suspend all deadlines in this case because the parties have reached a tentative settlement subject to required approval by officials in the Department of Justice. The Defendant is working expeditiously to obtain such approval as soon as possible and has no reason to believe that it will not be granted. However, certain deadlines will arise very quickly, potentially before the parties have obtained approvals and completed all the paperwork necessary to finalize the settlement. Those deadlines include:

- Tuesday, November 1, 2011: Joint Pretrial Stipulation Due [DE# 144 at 2]
- Tuesday, November 1, 2011: Filing of Documents Released From Protective Orders #3 and #4 Due [DE# 232]
- Wednesday, November 2, 2011: Hearing on Defendant’s Dispositive Motions [DE# 196]

Therefore, the parties request that the Court suspend all deadlines in the case for a reasonable

time to allow them to finalize the settlement. Once the settlement is final, the parties will file a Notice of Settlement as required by S.D. Fla. L.R. 16.2(F)(2).

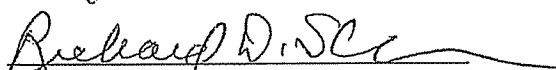
**CONCLUSION**

For the foregoing reasons, the United States respectfully requests that the Court suspend all deadlines in this case to allow the parties to finalize their settlement. A proposed order is attached.

Dated: October 27, 2011

Respectfully Submitted,

Jason D. Weisser, Fla. Bar No. 101435



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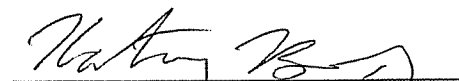
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Plaintiff,	)
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UNITED STATES OF AMERICA,	)
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**Certificate of Service**

I hereby certify that on October 27, 2011, 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 on the attached Service List by transmission of Notices of Electronic Filing generated by CM/ECF.

s/Kathryn N. Boling  
Kathryn N. Boling

**SERVICE LIST**

**Stevens v. United States, Case No. 03-81110-CIV-HURLEY/HOPKINS  
United States District Court, Southern District of Florida**

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