

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 06-22253 CIV-ALTONAGA/TURNOFF

2006 OCT -2 PM 4:08

NEVILLE W. HADJIOUK  
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S.D. OF FLA - MIA

MOTHER DOE I AND FATHER DOE I,  
INDIVIDUALLY, AND AS PARENTS AND  
GUARDIANS FOR MINOR R.M., et al.,

Plaintiffs,

v.

SHEIKH MOHAMMED BIN RASHID AL  
MAKTOUM, et al.,

Defendants.

**AGREED MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO  
COMPLAINT, AND FOR BRIEFING SCHEDULE FOLLOWING RESPONSE**

Pursuant to Federal Rule of Civil Procedure 7, and Local Rule 7.1 of this Court, Plaintiffs, by and through their undersigned counsel, and Defendant Sheikh Mohammed Bin Rashid Al Maktoum, by and through his undersigned counsel, respectfully move for an enlargement of time for Defendant's response to the Complaint, and for a briefing schedule following Defendant's response, and as supporting grounds state:

1. On September 7, 2006, Plaintiffs filed their class action complaint in this case.
2. A summons and a copy of the complaint were served on Defendant Sheikh Mohammed Bin Rashid Al Maktoum on September 11, 2006. Accordingly, his response to the complaint is due Monday, October 2, 2006.
3. Given the legal issues raised by the complaint, and the time required for a response, Defendant requires an enlargement of time to respond to the complaint.

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KENNY NACHWALTER, P.A.

*Handwritten signature*

4. Undersigned counsel for Defendant has conferred with counsel for the Plaintiffs, and Plaintiffs have agreed that Defendant may have 90 days from the date of service, until December 11, 2006, within which to respond to the complaint.

5. Plaintiffs and Defendant have further agreed upon the following briefing schedule for pleadings that may be required following Defendant's response:

- Plaintiffs shall have 60 days from the date of Defendant's response within which to submit opposing papers;
- Defendant shall have 45 days from the date of Plaintiffs' opposing papers within which to submit a reply; and
- Plaintiffs shall have 14 days from the date of Defendant's reply within which to submit a sur-reply.

6. The parties have agreed that this briefing schedule is without prejudice to any party's right to seek a further enlargement of time if unexpected circumstances arise.

7. This motion is without prejudice to Defendant's right to raise, and does not constitute a waiver of, any and all defenses, including but not limited to service of process.

8. This motion is made in good faith and not for purposes of delay.

9. A proposed order granting this agreed motion is attached.

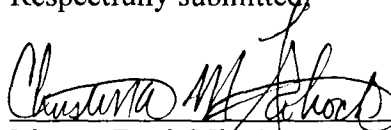
WHEREFORE, the parties respectfully request that the Court grant Defendant Sheikh Mohammed Bin Rashid Al Maktoum until and through December 11, 2006, within which to respond to the complaint, and grant the parties their agreed-upon briefing schedule for pleadings that may be required following Defendant's response.

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KENNY NACHWALTER, P.A.

Dated: October 2, 2006

Respectfully submitted

  
for Marcos Daniel Jiménez  
Florida Bar No. 441503  
[mjimenez@kennynachwalter.com](mailto:mjimenez@kennynachwalter.com)  
KENNY NACHWALTER, P.A.  
1100 Miami Center  
201 South Biscayne Boulevard  
Miami, Florida 33131  
Telephone: (305) 373-1000  
Fax: (305) 372-1861

*Attorneys for Defendant*  
[Sheikh Mohammed Bin Rashid Al Maktoum]

/s/ John Andres Thornton  
John Andres Thornton  
Florida Bar No. 0004820  
[johnandresthornton@hotmail.com](mailto:johnandresthornton@hotmail.com)  
9 Island Avenue, #2005  
Miami Beach, Florida 33131  
Tel.: (305) 532-6851  
Fax: (305) 538-1070

Jodi Westbrook Flowers  
SC Bar No. 66300  
[jflowers@motleyrice.com](mailto:jflowers@motleyrice.com)  
MOTLEY RICE LLC  
28 Bridgeside Blvd.  
P. O. Box 1792  
Mount Pleasant, SC 29465  
Tel.: (843) 216-9000  
Fax: (843) 216-9450

*Attorneys for Plaintiffs*

KENNY NACHWALTER, P.A.

**SERVICE LIST**

***Mother Doe 1, etc., et al. v. Sheikh Mohammed Bin Rashid Al Maktoum, et al.***  
**CASE NO. 06-22253 CIV-ALTONAGA/TURNOFF**

John Andres Thornton, Esq. (FL Bar #0004820)  
[johnandresthornton@hotmail.com](mailto:johnandresthornton@hotmail.com)  
JOHN ANDRES THORNTON, PL  
9 Island Avenue, #2005  
Miami Beach, FL 33139  
Telephone: 305/532-6851  
Fax: 305/538-1070

Marcos Jimenez (FL Bar #0441503)  
[mjimenez@kennynachwalter.com](mailto:mjimenez@kennynachwalter.com)  
KENNY NACHWALTER, P.A.  
1100 Miami Center  
201 South Biscayne Blvd.  
Miami, FL 33131  
Telephone: 305/373-1000  
Fax: 305/372-1861  
Attorneys for Defendant  
[Sheikh Mohammed Bin Rashid Al  
Maktoum]

Ronald L. Motley, Esq. (SC Bar No. 4123)  
[rlmotley@motleyrice.com](mailto:rlmotley@motleyrice.com)  
Jodi Westbrook Flowers, Esq. (SC Bar No. 66300)  
[jflowers@motleyrice.com](mailto:jflowers@motleyrice.com)  
Donald Migliori, Esq. (RI Bar No. 4936;  
MA Bar No. 567562; and MN Bar No. 0245951)  
[dmigliori@motleyrice.com](mailto:dmigliori@motleyrice.com)  
Michael Elsner, Esq. (NY ME-8337;  
VA 41424; SC 72893)  
[melsner@motleyrice.com](mailto:melsner@motleyrice.com)  
Justice B. Kaplan, Esq. (TN Bar No. 022145)  
[jkaplan@motleyrice.com](mailto:jkaplan@motleyrice.com)  
John M. Eubanks, Esq. (MD Bar No. 0401050004)  
[jeubanks@motleyrice.com](mailto:jeubanks@motleyrice.com)  
MOTLEY RICE LLC  
28 Bridgeside Boulevard  
P.O. Box 1792  
Mount Pleasant, South Carolina 29465  
Tel.: (843) 216-9000  
Fax: (843) 216-9450  
Attorneys for Plaintiffs

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KENNY NACHWALTER, P.A.