# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

AMERICAN WASTE MANAGEMENT AND RECYCLING, LLC.	CIVIL NO.: 07- 1658 (JAF)
Plaintiff, v.	BREACH OF CONTRACT; COLLECTION OF MONIES; and DAMAGES.
CEMEX PUERTO RICO; CANOPY ECOTERRA, XYZ INSURANCE COMPANIES.	JURY TRIAL DEMANDED
Defendants.	

# **MOTION FOR LEAVE TO FILE DOCUMENTS IN THE SPANISH LANGUAGE AND FOR EXTENSION OF TIME IN WHICH TO FILE TRANSLATIONS**

#### TO THE HONORABLE COURT:

### NOW APPEARS Plaintiff AMERICAN WASTE MANAGEMENT AND RECYCLING,

LLC, and through the undersigned attorneys, respectfully **STATES**, **ALLEGES** and **REQUESTS** as follows:

On this day, Plaintiff filed a Verified Complaint in the present case. As attachments to the same, Plaintiff filed several documents in the Spanish language. The Local Rules specify that all documents filed with the Court must be in the English language. Plaintiffs therefore very respectfully request that this Honorable Court grant them a thirty (30) day extension of time on which to translate several of the documents filed as Exhibits to their Complaint, to expire on August 24, 2007.

WHEREFORE, Plaintiffs respectfully request that the Honorable Court GRANT the present motion in its entirety, and as a result thereof, grant Plaintiffs a thirty (30) day extension of time in

which to file translations of the Exhibits to their motion, to expire on August 24, 2007.

# **RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 24<sup>th</sup> day of July, 2007.

### INDIANO & WILLIAMS, P.S.C.

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- By: <u>s/ Jeffrey M. Williams</u> JEFFREY M. WILLIAMS U.S.D.C.P.R. Bar No. 202414
- By: s/ Ada Sofia Esteves ADA SOFIA ESTEVES U.S.D.C.P.R. Bar No. 216910