

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

**AMERICAN WASTE MANAGEMENT
AND RECYCLING, LLC.**

Plaintiff,

v.

**CEMEX PUERTO RICO; CANOPY
ECOTERRA, XYZ INSURANCE
COMPANIES.**

Defendants.

CIVIL NO.: 07- 1658 (JAF)

BREACH OF CONTRACT; COLLECTION
OF MONIES; and DAMAGES.

JURY TRIAL DEMANDED

**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 an opposition to co-Defendant Ecoterra's Motion to Dismiss. As an attachment to the same, Plaintiff filed a document 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 the document filed as Exhibit 2 to their opposition, to expire on October 12, 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 a translation of Exhibit 2 to their motion, to expire on October 12, 2007.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of September, 2007.

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