UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

WILLIAM H. CLAFLIN, IV; *et. al.,* Plaintiffs, vs. LAFARGEHOLCIM LTD; INVERSIONES IBERSUIZAS S.A.; HOLCIM TRADING SA (F/K/A) UNION MARITIMA INTERNACIONAL SA; DE RUITER OUDERLANDE B.V.; LAS PAILAS DE CEMENTO S.A.U.; and UNKNOWN SUBSIDIARY OF THE LAFARGEHOLCIM GROUP. Defendants.	Case No. 1:20-cv-23787

JOINT STIPULATION AND PROPOSED ORDER EXTENDING AND STAYING ALL DEADLINES

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 Ruiter Ouderlande B.V.; Las Pailas de Cemento S.A.U.; and Unknown Subsidiary of the LafargeHolcim Group (collectively, the "Defendants");

WHEREAS Defendant LafargeHolcim Ltd ("LafargeHolcim") reserves all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but waives any objections as to the sufficiency of service;

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

WHEREAS Plaintiffs and LafargeHolcim jointly stipulated on March 23, 2021 to extend LafargeHolcim's time to respond to the Complaint until May 21, 2021;

WHEREAS Plaintiffs and LafargeHolcim participated in a mediation on April 22, 2021;

WHEREAS, since then, the parties have been engaged in ongoing settlement discussions;

WHEREAS, to provide additional time to reach a resolution, the parties have agreed to extend all deadlines in the action by an additional five (5) days.

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

1. All deadlines for all parties in the litigation, including all deadlines to answer, move to dismiss, or otherwise respond to the Complaint, are extended by five (5) days pending ongoing settlement discussions; and

2. On or before the fifth (5th) day from the signing of the Order, the parties shall jointly notify the Court if a settlement has been reached or shall submit a proposed schedule for additional proceedings.

Respectfully submitted,

Dated: May 19, 2021

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

By: */s/ David Baron*

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Counsel for Plaintiffs

Dated: May 19, 2021

STEARNS WEAVER MILLER WEISSLER ALHADEFF& SITTERSON, P.A.

By: */s/ Grace L. Mead*
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Counsel for Defendant LafargeHolcim Ltd

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[PROPOSED] ORDER REGARDING STAY AND EXTENSION OF DEADLINES

THIS CAUSE came before the Court upon Joint Stipulation Regarding Stay and Extension of Deadlines of the Plaintiffs and defendant LafargeHolcim Ltd and, upon due consideration and for good cause shown,

IT IS HEREBY ORDERED as follows:

1. All deadlines for all parties in the litigation, including all deadlines to answer, move to dismiss, or otherwise respond to the Complaint, are extended by five (5) days pending ongoing settlement discussions; and
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Dated: _____, 2021.

_____
AILEEN M. CANNON
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of May, 2021, I electronically filed and served the foregoing with the Clerk of the Court by using the CM/ECF.

By: */s/ Grace L. Mead*
Grace L. Mead

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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Grace L. Mead