

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

JESSIE HOFFMAN, ET AL.)	
<i>Plaintiff</i>)	
)	
CHRISTOPHER SEPULVADO)	
<i>Intervenor</i>)	Civil Action No. 12-796-JJB-EWD
)	
v.)	
)	
BOBBY JINDAL, ET AL.)	
<i>Defendants</i>)	

**UNOPPOSED MOTION TO CONTINUE
STATUS CONFERENCE AND EXTEND STAY**

MAY IT PLEASE THE COURT:

NOW INTO COURT, through undersigned counsel, come Defendants, Louisiana Department of Public Safety and Corrections, James M. LeBlanc, Secretary of Louisiana Department of Public Safety and Corrections in his official capacity, Darrel Vannoy, Warden of Louisiana State Penitentiary in his official capacity, and James “Jimmy” Cruze, Jr., Assistant Warden of Louisiana State Penitentiary in his official capacity, (collectively “Defendants”) who move this Court to continue the status conference presently set for July 11, 2016, and, further, extend the stay and terms of Consent Orders (Rec. Docs. 178 and 188), for eighteen months or until January 8, 2018.

1.

In support of the motion, undersigned counsel represents the following:

2.

On May 20, 2016, a telephone status conference was held before the Honorable Magistrate Judge Erin Wilder-Doomes with all parties participating through counsel of record. (Rec. Doc. 195.)

3.

Counsel discussed the status of the case. (Rec. Doc. 195)

4.

The Court questioned counsel about the Consent Order entered on June 23, 2015, staying all proceedings in this matter through July 11, 2016, as well as imposing a stay of any executions of any Plaintiffs, and extending the temporary restraining order in effect with regard to the execution of Christopher Sepulvado. (Rec. Doc. 195).

5.

Counsel were in agreement that a continuance of the stay for another year was appropriate.

6.

In accordance with Magistrate Wilder-Doomes' order, undersigned counsel conferred with her clients and confirmed that they do not object to a stay.

7.

Undersigned counsel also conferred with counsel for the Plaintiffs, Michael Rubenstein, who agreed, on behalf of the Plaintiffs, that he does not object to a stay. Mr. Rubenstein further agreed that given that a twelve month stay would put all parties back in the position of dealing with a legislative session and possible conflicts resulting from same, it would be prudent to extend the stay for eighteen months or until approximately January 8, 2018.

Defendants request this continuance and extension of the stay because the facts and issues that are involved in this proceeding continue to be in a fluid state, meaning that it would be a waste of resources and time to litigate this matter at present time.

WHEREFORE Defendants pray that this Court continue the status conference set for July 11, 2016, and extend the stay and terms of the Consent Orders previously entered by this Court through January 8, 2018.

RESPECTFULLY SUBMITTED:

JEFF LANDRY
ATTORNEY GENERAL

BY: /s/Elizabeth Baker Murrill

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CERTIFICATE OF SERVICE

I do hereby certify that, on this 31st day of May 2016, the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system which gives notice of filing to all counsel of record at the following email address:

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