

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

RURAL ROUTE 3 HOLDINGS, L.P.,

Plaintiff,

v.

PATRICK A.P. DE MAN,

Defendant.

Case No.: 3:17-cv-01948

**JOINT STIPULATION REQUESTING STAY OF PROCEEDINGS  
AND EXTENSION OF TRO (DKT. # 20)**

TO THE HONORABLE COURT:

**COME NOW** Plaintiff Rural Route 3 Holdings, L.P. (“RR3”) and Patrick A. P. de Man (“Mr. de Man”)(RR3 and Mr. de Man are jointly referred to as the “Parties”), through their respective undersigned legal counsel, and respectfully state and pray as follows:

1. In compliance with the Order issued on August 15, 2017 (Docket # 28), the Parties explored settlement and have reached an agreement in principle that should end this litigation.
2. However, the undersigned counsel are drafting the settlement documents, which should be executed on or before Friday, August 25, 2017.
3. Accordingly, in order to allow the Parties to finalize the settlement documents and to save the parties’ and the Court’s resources, the Parties jointly request the Court to stay the proceedings in this case (including without limitation the

TRO/Preliminary Injunction hearing scheduled for this Thursday August 24, 2017) for a period not to exceed four (4) days, that is, until this Friday August 25, 2017.

4. Furthermore, the Parties have agreed to extend the duration of the Temporary Restraining Order issued by this Court on August 10, 2017 (Docket No. 20) until this Friday August 25, 2017. The Parties expect to further extend the Temporary Restraining Order pursuant to the terms of the Parties' settlement agreement.

**WHEREFORE**, Rural Route 3 Holdings, L.P. and Patrick A. P. de Man respectfully request that the Honorable Court:

A. Stay the proceedings in this case (including without limitation the TRO/Preliminary Injunction hearing scheduled for this Thursday August 24, 2017) for a period not to exceed four (4) days, that is, until this Friday August 25, 2017; and

B. Extend the duration of the Temporary Restraining Order issued by this Court on August 10, 2017 (Docket No. 20) until this Friday August 25, 2017; providing that it may be further extended pursuant to the terms of the Parties' settlement agreement.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 21st day of August, 2017.

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