

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF FLORIDA**

Frantz Pierre

CASE NO. 1:17-CV-20337

Plaintiff/Petitioner

Vs.

**William Serda Deputy City Manager Individual Capacity
Jose Smith City Attorney Individual Capacity**

Defendant/Respondent

**MOTION TO STAY THE ABOVE CAPTIONED CASE
FOR 90 DAYS DUE TO HEART SURGERY.**

COMES NOW, and Plaintiff, Frantz Pierre by and through undersigned counsel and hereby files this motion to stay and in support thereof hereby offers the following:

1. On March 6th 2017 Plaintiff filed an amended complaint against defendants in the above captioned case. Secheduled order setting case for trial has been summited by the court dated May 31, 2017.
2. Plaintiff has underwent quadruple bypass major heart surgery and is currently in revocery.
3. Plaintiff is respectfully requesting that the Honorable Court enter an order to stay the cause and all deadlines in the above captioned case for 90 days in order to prepare for trial.
4. Undersigned attorney will continue to update Plaintiff's progress with the Court so that a time-table for his return can be fixed.

PRAYER FOR RELIEF

Plaintiff is respectfully requesting an order be entered in the above captioned case to stay the case for 90 days.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by through the E-Portal to the Clerk of Court for the Southern District of Florida, this 28th day of June, 2017.

/s/ Gregory D. Curtis Esq.

Gregory D. Curtis Esq.

17325 N.W. 27th Avenue

Suite 103

Miami Gardens, Florida 33056

Tel: (305) 622 9199

Fax: (305) 622 9129

Florida Bar # 0492108

curtislegalgroup@aol.com