

**U.S. District Court  
Southern District of Florida (Key West)  
CIVIL DOCKET FOR CASE #: 4:18-cv-10279-KMW**

Brown v. Ramsay  
Assigned to: Judge Kathleen M. Williams  
Referred to: Magistrate Judge Edwin G. Torres  
Cause: 42:1983 Civil Rights Act

Date Filed: 12/03/2018  
Jury Demand: Defendant  
Nature of Suit: 440 Civil Rights:  
Other  
Jurisdiction: Federal Question

**Plaintiff**

**Peter Sean Brown**

represented by **Amien Kacou**  
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V.

**Defendant**

**Sheriff Richard A. Ramsay**  
*in his official capacity*

represented by **Bruce Wallace Jolly**  
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| Date Filed | #                 | Docket Text   |
|------------|-------------------|---|
| 12/03/2018 | <a href="#">1</a> | Complaint pursuant to 42 USC 1983 against Richard A. Ramsay. Filing fee \$ 400.00 receipt number 113C-11206151, filed by Peter Sean Brown. (Attachments: # <a href="#">1</a> Civil Cover Sheet, # <a href="#">2</a> Summon(s))(Kacou, Amien) (Entered: 12/03/2018)  |
| 12/03/2018 | 2                 | <p>Clerks Notice of Judge Assignment to Chief Judge K. Michael Moore and Ch. Magistrate Judge Andrea M. Simonton.</p> <p>Pursuant to 28 USC 636(c), the parties are hereby notified that the U.S. Magistrate Judge Andrea M. Simonton is available to handle any or all proceedings in this case. If agreed, parties should complete and file the Consent form found on our website. It is not necessary to file a document indicating lack of consent.</p> <p>Pro se (NON-PRISONER) litigants may receive Notices of Electronic Filings (NEFS) via email after filing a Consent by Pro Se Litigant (NON-PRISONER) to Receive Notices of Electronic Filing. The consent form is available under the forms section of our website. (lbc) (Entered: 12/03/2018)</p> |
| 12/03/2018 | <a href="#">3</a> | Summons Issued as to Richard A. Ramsay. (lbc) (Entered: 12/03/2018)   |
| 12/03/2018 | 4                 | PAPERLESS PRETRIAL ORDER. This order has been entered upon the filing of the complaint. Plaintiff's counsel is hereby ORDERED to forward to all defendants, upon receipt of a responsive pleading, a copy of this Order. It is further ORDERED that S.D. Fla. L.R. 16.1 shall apply to this case and the parties shall hold a scheduling conference no later than twenty (20) days after the filing of the first responsive pleading by the last responding defendant, or within sixty (60) days after the filing of the complaint, whichever occurs first. However, if all defendants have   |

not been served by the expiration of this deadline, Plaintiff shall move for an enlargement of time to hold the scheduling conference, not to exceed 90 days from the filing of the Complaint. Within ten (10) days of the scheduling conference, counsel shall file a joint scheduling report. Failure of counsel to file a joint scheduling report within the deadlines set forth above may result in dismissal, default, and the imposition of other sanctions including attorney's fees and costs. The parties should note that the time period for filing a joint scheduling report is not tolled by the filing of any other pleading, such as an amended complaint or Rule 12 motion. The scheduling conference may be held via telephone. At the conference, the parties shall comply with the following agenda that the Court adopts from S.D. Fla. L.R. 16.1: (1) Documents (S.D. Fla. L.R. 16.1.B.1 and 2) - The parties shall determine the procedure for exchanging a copy of, or a description by category and location of, all documents and other evidence that is reasonably available and that a party expects to offer or may offer if the need arises. Fed. R. Civ. P. 26(a)(1)(B). (a) Documents include computations of the nature and extent of any category of damages claimed by the disclosing party unless the computations are privileged or otherwise protected from disclosure. Fed. R. Civ. P. 26(a)(1)(C). (b) Documents include insurance agreements which may be at issue with the satisfaction of the judgment. Fed. R. Civ. P. 26(a)(1)(D). (2) List of Witnesses - The parties shall exchange the name, address and telephone number of each individual known to have knowledge of the facts supporting the material allegations of the pleading filed by the party. Fed. R. Civ. P. 26(a)(1)(A). The parties have a continuing obligation to disclose this information. (3) Discussions and Deadlines (S.D. Fla. L.R. 16.1.B.2) - The parties shall discuss the nature and basis of their claims and defenses and the possibilities for a prompt settlement or resolution of the case. Failure to comply with this Order or to exchange the information listed above may result in sanctions and/or the exclusion of documents or witnesses at the time of trial. S.D. Fla. L.R. 16.1.I.

Pursuant to Administrative Order 2016-70 of the Southern District of Florida and consistent with the Court of Appeals for the Eleventh Circuits Local Rules and Internal Operating Procedures, within three days of the conclusion of a trial or other proceeding, parties must file via CM/ECF electronic versions of documentary exhibits admitted into evidence, including photographs of non-documentary physical exhibits. The Parties are directed to comply with each of the requirements set forth in Administrative Order 2016-70 unless directed otherwise by the Court.

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|            |                   | Telephonic appearances are not permitted for any purpose. Upon reaching a settlement in this matter the parties are instructed to notify the Court by telephone and to file a Notice of Settlement within twenty-four (24) hours. Signed by Chief Judge K. Michael Moore on 12/3/2018. (osk) (Entered: 12/03/2018)   |
| 12/03/2018 | <a href="#">5</a> | PAPERLESS ORDER REFERRING PRETRIAL DISCOVERY MATTERS TO CHIEF MAGISTRATE JUDGE ANDREA M. SIMONTON. PURSUANT to 28 U.S.C. § 636 and the Magistrate Rules of the Local Rules of the Southern District of Florida, the above-captioned Cause is referred to United States Magistrate Judge Andrea M. Simonton to take all necessary and proper action as required by law with respect to any and all pretrial discovery matters. Any motion affecting deadlines set by the Court's Scheduling Order is excluded from this referral, unless specifically referred by separate Order. It is FURTHER ORDERED that the parties shall comply with Magistrate Judge Andrea M. Simonton's discovery procedures, which can be found on the Southern District of Florida website, www.flsd.uscourts.gov, under the tab for Judge Simonton, in the drop down menu Judge Information. Signed by Chief Judge K. Michael Moore on 12/3/2018. (osk) (Entered: 12/03/2018) |
| 12/03/2018 | <a href="#">6</a> | Notice of Pending, Refiled, Related or Similar Actions by Peter Sean Brown (Kacou, Amien) (Entered: 12/03/2018)  |
| 12/06/2018 | <a href="#">7</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Spencer Amdur. Filing Fee \$ 75.00 Receipt # 113C-11219470 by Peter Sean Brown. Responses due by 12/20/2018 (Attachments: # <a href="#">1</a> Certification Rule 4(b), # <a href="#">2</a> Text of Proposed Order)(Kacou, Amien) (Entered: 12/06/2018)   |
| 12/06/2018 | <a href="#">8</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Cody Wofsy. Filing Fee \$ 75.00 Receipt # 113C-11219518 by Peter Sean Brown. Responses due by 12/20/2018 (Attachments: # <a href="#">1</a> Certification Rule 4(b), # <a href="#">2</a> Text of Proposed Order)(Kacou, Amien) (Entered: 12/06/2018)  |
| 12/06/2018 | <a href="#">9</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Omar Jadwat. Filing Fee \$ 75.00 Receipt # 113C-11219560 by Peter Sean Brown. Responses due by 12/20/2018 (Attachments: # <a href="#">1</a> Certification Rule 4(b), # <a href="#">2</a> Text of Proposed Order)(Kacou, Amien) (Entered: 12/06/2018)   |

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| 12/06/2018 | <a href="#">10</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Lee Gelernt. Filing Fee \$ 75.00 Receipt # 113C-11219602 by Peter Sean Brown. Responses due by 12/20/2018 (Attachments: # <a href="#">1</a> Certification Rule 4(b), # <a href="#">2</a> Text of Proposed Order)(Kacou, Amien) (Entered: 12/06/2018)   |
| 12/07/2018 | 11                 | PAPERLESS ORDER. THIS CAUSE came before the Court upon the Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing. <a href="#">7</a> . UPON CONSIDERATION of the Motion, the pertinent portions of the record, and being otherwise fully advised in the premises, it is ORDERED AND ADJUDGED that the Motion 27 is GRANTED. Spencer Amdur may appear pro hac vice in this matter. The Clerk of Court shall provide electronic notification of all electronic filings to samdur@aclu.org. Signed by Chief Judge K. Michael Moore on 12/7/2018. (osk) (Entered: 12/07/2018) |
| 12/07/2018 | 12                 | PAPERLESS ORDER. THIS CAUSE came before the Court upon the Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing. <a href="#">8</a> . UPON CONSIDERATION of the Motion, the pertinent portions of the record, and being otherwise fully advised in the premises, it is ORDERED AND ADJUDGED that the Motion 27 is GRANTED. Cody Wofsy may appear pro hac vice in this matter. The Clerk of Court shall provide electronic notification of all electronic filings to cwofsy@aclu.org. Signed by Chief Judge K. Michael Moore on 12/7/2018. (osk) (Entered: 12/07/2018)    |
| 12/07/2018 | 13                 | PAPERLESS ORDER. THIS CAUSE came before the Court upon the Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing. <a href="#">9</a> . UPON CONSIDERATION of the Motion, the pertinent portions of the record, and being otherwise fully advised in the premises, it is ORDERED AND ADJUDGED that the Motion 27 is GRANTED. Omar Jadwat may appear pro hac vice in this matter. The Clerk of Court shall provide electronic notification of all electronic filings to ojadwat@aclu.org. Signed by Chief Judge K. Michael Moore on 12/7/2018. (osk) (Entered: 12/07/2018)  |
| 12/07/2018 | 14                 | PAPERLESS ORDER. THIS CAUSE came before the Court upon the Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing. <a href="#">10</a> . UPON CONSIDERATION of the Motion, the pertinent portions of the record, and being otherwise fully advised in the premises, it is ORDERED AND ADJUDGED that the  |

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|            |                    | Motion 27 is GRANTED. Lee Gelernt may appear pro hac vice in this matter. The Clerk of Court shall provide electronic notification of all electronic filings to lgelernt@aclu.org. Signed by Chief Judge K. Michael Moore on 12/7/2018. (osk) (Entered: 12/07/2018)  |
| 12/07/2018 | <a href="#">15</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Avi Garbow. Filing Fee \$ 75.00 Receipt # 113C-11223920 by Peter Sean Brown. Responses due by 12/21/2018 (Attachments: # <a href="#">1</a> Certification Rule 4(b), # <a href="#">2</a> Text of Proposed Order)(Kacou, Amien) (Entered: 12/07/2018)  |
| 12/07/2018 | <a href="#">16</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Jonathan Soleimani. Filing Fee \$ 75.00 Receipt # 113C-11223974 by Peter Sean Brown. Responses due by 12/21/2018 (Attachments: # <a href="#">1</a> Certification Rule 4(b), # <a href="#">2</a> Text of Proposed Order)(Kacou, Amien) (Entered: 12/07/2018)  |
| 12/07/2018 | <a href="#">17</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Jason Kim. Filing Fee \$ 75.00 Receipt # 113C-11223983 by Peter Sean Brown. Responses due by 12/21/2018 (Attachments: # <a href="#">1</a> Certification Rule 4(b), # <a href="#">2</a> Text of Proposed Order)(Kacou, Amien) (Entered: 12/07/2018)   |
| 12/08/2018 | 18                 | PAPERLESS PRETRIAL ORDER. This order has been entered upon the filing of the complaint. Plaintiff's counsel is hereby ORDERED to forward to all defendants, upon receipt of a responsive pleading, a copy of this Order. It is further ORDERED that S.D. Fla. L.R. 16.1 shall apply to this case and the parties shall hold a scheduling conference no later than twenty (20) days after the filing of the first responsive pleading by the last responding defendant, or within sixty (60) days after the filing of the complaint, whichever occurs first. However, if all defendants have not been served by the expiration of this deadline, Plaintiff shall move for an enlargement of time to hold the scheduling conference, not to exceed 90 days from the filing of the Complaint. Within ten (10) days of the scheduling conference, counsel shall file a joint scheduling report. Failure of counsel to file a joint scheduling report within the deadlines set forth above may result in dismissal, default, and the imposition of other sanctions including attorney's fees and costs. The parties should note that the time period for filing a joint scheduling report is not tolled by the filing of any other pleading, such as an amended |

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|            |    | <p>complaint or Rule 12 motion. The scheduling conference may be held via telephone. At the conference, the parties shall comply with the following agenda that the Court adopts from S.D. Fla. L.R. 16.1: (1) Documents (S.D. Fla. L.R. 16.1.B.1 and 2) - The parties shall determine the procedure for exchanging a copy of, or a description by category and location of, all documents and other evidence that is reasonably available and that a party expects to offer or may offer if the need arises. Fed. R. Civ. P. 26(a)(1)(B). (a) Documents include computations of the nature and extent of any category of damages claimed by the disclosing party unless the computations are privileged or otherwise protected from disclosure. Fed. R. Civ. P. 26(a)(1)(C). (b) Documents include insurance agreements which may be at issue with the satisfaction of the judgment. Fed. R. Civ. P. 26(a)(1)(D). (2) List of Witnesses - The parties shall exchange the name, address and telephone number of each individual known to have knowledge of the facts supporting the material allegations of the pleading filed by the party. Fed. R. Civ. P. 26(a)(1)(A). The parties have a continuing obligation to disclose this information. (3) Discussions and Deadlines (S.D. Fla. L.R. 16.1.B.2) - The parties shall discuss the nature and basis of their claims and defenses and the possibilities for a prompt settlement or resolution of the case. Failure to comply with this Order or to exchange the information listed above may result in sanctions and/or the exclusion of documents or witnesses at the time of trial. S.D. Fla. L.R. 16.1.I.</p> <p>Pursuant to Administrative Order 2016-70 of the Southern District of Florida and consistent with the Court of Appeals for the Eleventh Circuits Local Rules and Internal Operating Procedures, within three days of the conclusion of a trial or other proceeding, parties must file via CM/ECF electronic versions of documentary exhibits admitted into evidence, including photographs of non-documentary physical exhibits. The Parties are directed to comply with each of the requirements set forth in Administrative Order 2016-70 unless directed otherwise by the Court.</p> <p>Telephonic appearances are not permitted for any purpose. Upon reaching a settlement in this matter the parties are instructed to notify the Court by telephone and to file a Notice of Settlement within twenty-four (24) hours. Signed by Chief Judge K. Michael Moore on 12/8/2018. (osk) (Entered: 12/08/2018)</p> |
| 12/08/2018 | 19 | <p>PAPERLESS ORDER REFERRING PRETRIAL DISCOVERY MATTERS TO CHIEF MAGISTRATE JUDGE ANDREA M. SIMONTON. PURSUANT to 28 U.S.C. § 636 and the Magistrate Rules of the Local Rules of the Southern District of Florida, the</p>  |

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|            |    | <p>above-captioned Cause is referred to United States Magistrate Judge Andrea M. Simonton to take all necessary and proper action as required by law with respect to any and all pretrial discovery matters. Any motion affecting deadlines set by the Court's Scheduling Order is excluded from this referral, unless specifically referred by separate Order. It is FURTHER ORDERED that the parties shall comply with Magistrate Judge Andrea M. Simonton's discovery procedures, which can be found on the Southern District of Florida website, <a href="http://www.flsd.uscourts.gov">www.flsd.uscourts.gov</a>, under the tab for Judge Simonton, in the drop down menu Judge Information. Signed by Chief Judge K. Michael Moore on 12/8/2018. (osk) (Entered: 12/08/2018)</p> |
| 12/08/2018 | 20 | <p>PAPERLESS ORDER. THIS CAUSE came before the Court upon the Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing. <a href="#">15</a> . UPON CONSIDERATION of the Motion, the pertinent portions of the record, and being otherwise fully advised in the premises, it is ORDERED AND ADJUDGED that the Motion <a href="#">16</a> is GRANTED. Avi Garbow may appear pro hac vice in this matter. The Clerk of Court shall provide electronic notification of all electronic filings to <a href="mailto:agarbow@gibsondunn.com">agarbow@gibsondunn.com</a>. Signed by Chief Judge K. Michael Moore on 12/8/2018. (osk) (Entered: 12/08/2018)</p>   |
| 12/08/2018 | 21 | <p>PAPERLESS ORDER. THIS CAUSE came before the Court upon the Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing. <a href="#">16</a> . UPON CONSIDERATION of the Motion, the pertinent portions of the record, and being otherwise fully advised in the premises, it is ORDERED AND ADJUDGED that the Motion <a href="#">16</a> is GRANTED. Jonathan Soleimani may appear pro hac vice in this matter. The Clerk of Court shall provide electronic notification of all electronic filings to <a href="mailto:jsoleimani@gibsondunn.com">jsoleimani@gibsondunn.com</a>. Signed by Chief Judge K. Michael Moore on 12/8/2018. (osk) (Entered: 12/08/2018)</p>   |
| 12/08/2018 | 22 | <p>PAPERLESS ORDER. THIS CAUSE came before the Court upon the Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing. <a href="#">17</a> . UPON CONSIDERATION of the Motion, the pertinent portions of the record, and being otherwise fully advised in the premises, it is ORDERED AND ADJUDGED that the Motion <a href="#">17</a> is GRANTED. Jason Kim may appear pro hac vice in this matter. The Clerk of Court shall provide electronic notification of all electronic filings to <a href="mailto:jkim@gibsondunn.com">jkim@gibsondunn.com</a>.</p>   |

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|            |                    | Signed by Chief Judge K. Michael Moore on 12/8/2018. (osk) (Entered: 12/08/2018)  |
| 12/08/2018 | <a href="#">23</a> | SUMMONS (Affidavit) Returned Executed on <a href="#">1</a> Complaint 42 USC 1983 or Bivens with a 21 day response/answer filing deadline by Peter Sean Brown. Richard A. Ramsay served on 12/4/2018, answer due 12/26/2018. (Kacou, Amien) (Entered: 12/08/2018)  |
| 12/11/2018 | <a href="#">24</a> | NOTICE of Attorney Appearance by Bruce Wallace Jolly on behalf of Richard A. Ramsay. Attorney Bruce Wallace Jolly added to party Richard A. Ramsay(pty:dft). (Jolly, Bruce) (Entered: 12/11/2018)   |
| 12/12/2018 | <a href="#">25</a> | ORDER TRANSFERRING CASE to Judge Kathleen M. Williams for all further proceedings, accepted and signed on 12/12/2018. Chief Judge K. Michael Moore no longer assigned to case Signed by Chief Judge K. Michael Moore on 12/12/2018. <i>See attached document for full details.</i> (c ds) (Entered: 12/13/2018)   |
| 12/13/2018 | <a href="#">26</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Sarah M. Rich. Filing Fee \$ 75.00 Receipt # 113C-11240312 by Peter Sean Brown. Responses due by 12/27/2018 (Bonilla Lopez, Viviana) (Entered: 12/13/2018)  |
| 12/14/2018 | 27                 | PAPERLESS ORDER REFERRING <a href="#">26</a> MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Sarah M. Rich. Filing Fee \$ 75.00 Receipt # 113C-11240312 filed by Peter Sean Brown. ORDER REFERRING CASE to Magistrate Judge Edwin G. Torres for Pretrial Non-Dispositive Matters. Ch. Magistrate Judge Andrea M. Simonton no longer assigned as referral judge in this case. Motions referred to Judge Edwin G. Torres. Signed by Judge Kathleen M. Williams on 12/14/2018. (jws) (Entered: 12/14/2018) |
| 12/14/2018 | 28                 | PAPERLESS ORDER granting <a href="#">26</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney(s) Sarah M. Rich. The Clerk shall add pro hac counsel as co-counsel of record for Plaintiff.<br><br>Signed by Magistrate Judge Edwin G. Torres on 12/14/2018. (EGT) (Entered: 12/14/2018)  |

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| 12/20/2018 | <a href="#">29</a> | MOTION for Extension of Time to File Response/Reply/Answer by Richard A. Ramsay. (Jolly, Bruce) (Entered: 12/20/2018)  |
| 12/20/2018 | 30                 | PAPERLESS ORDER granting <a href="#">29</a> Unopposed Motion for Extension of Time to File Response/Answer to Plaintiff's Complaint. Upon a review of the motion and for good cause shown, Defendant's motion is GRANTED. Defendant shall file a response to Plaintiff's complaint by <b>January 2, 2019</b> and Plaintiff shall, if appropriate, file a response by <b>January 23, 2019</b> . Signed by Judge Kathleen M. Williams on 12/20/2018. (jws) (Entered: 12/20/2018)   |
| 01/02/2019 | <a href="#">31</a> | ANSWER and Affirmative Defenses to Complaint with Jury Demand by Richard A. Ramsay. (Jolly, Bruce) (Entered: 01/02/2019)   |
| 01/02/2019 | <a href="#">32</a> | ORDER. Responses due by 2/8/2019. Signed by Judge Kathleen M. Williams on 1/2/2019. <i>See attached document for full details.</i> (lbc) (Entered: 01/02/2019)   |
| 02/08/2019 | <a href="#">33</a> | STATUS REPORT by Peter Sean Brown (Attachments: # <a href="#">1</a> Supplement Jointly Proposed Schedule)(Kacou, Amien) (Entered: 02/08/2019)  |
| 02/11/2019 | <a href="#">34</a> | SCHEDULING ORDER: Jury Trial set for 2/3/2020 in Miami Division before Judge Kathleen M. Williams. Calendar Call set for 1/28/2020 11:00 AM before Judge Kathleen M. Williams. Signed by Judge Kathleen M. Williams on 2/11/2019. <i>See attached document for full details.</i> (cds)<br><br><a href="#">Pattern Jury Instruction Builder - To access the latest, up to date changes to the 11th Circuit Pattern Jury Instructions go to <a href="https://pji.ca11.uscourts.gov">https://pji.ca11.uscourts.gov</a> or click here.</a> (Entered: 02/11/2019) |
| 02/22/2019 | <a href="#">35</a> | Unopposed MOTION to Withdraw as Attorney by Avi Garbow for / by Peter Sean Brown. Responses due by 3/8/2019 (Attachments: # <a href="#">1</a> Text of Proposed Order Proposed Order Granting Unopposed Motion to Withdraw as Counsel)(Kacou, Amien) (Entered: 02/22/2019)  |
| 03/08/2019 | 36                 | PAPERLESS ORDER granting <a href="#">35</a> Motion to Withdraw as Attorney. Avi Samuel Garbow withdrawn from case as counsel or Plaintiff who remains represented in the action through other counsel of record.   |

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|            |                    | Signed by Magistrate Judge Edwin G. Torres on 3/8/2019. (EGT)<br>(Entered: 03/08/2019)  |
| 03/13/2019 | <a href="#">37</a> | Request for Clerk to Appoint Mediator(Kacou, Amien) (Entered: 03/13/2019)   |
| 03/14/2019 | <a href="#">38</a> | Clerk's Appointment of Mediator: Thomas D. Lardin added (pt)<br>(Entered: 03/14/2019)   |
| 04/02/2019 | <a href="#">39</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Heather L. Richardson. Filing Fee \$ 75.00 Receipt # 113C-11525551 by Peter Sean Brown. Responses due by 4/16/2019 (Attachments: # <a href="#">1</a> Certification of H. Richardson in support of PHV Application, # <a href="#">2</a> Text of Proposed Order Granting H. Richardson PHV Application)(Kacou, Amien) (Entered: 04/02/2019)   |
| 04/03/2019 | 40                 | PAPERLESS ORDER granting <a href="#">39</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney(s) Heather L. Richardson as co-counsel of record for Plaintiff.<br><br>Signed by Magistrate Judge Edwin G. Torres on 4/3/2019. (EGT)<br>(Entered: 04/03/2019)  |
| 04/03/2019 | <a href="#">41</a> | (STRICKEN PER DE#42)NOTICE by Richard A. Ramsay of <i>Taking Deposition (Plaintiff)</i> (Jolly, Bruce)Text Modified on 4/4/2019 (cqs). (Entered: 04/03/2019)  |
| 04/03/2019 | 42                 | PAPERLESS ORDER STRIKING <a href="#">41</a> Notice (Other) of Deposition filed by Richard A. Ramsay. Defendant's notice of deposition is STRICKEN for failure to comply with the Local Rules for the Southern District of Florida. Local Rule 26.1 provides "[i]nitial and expert disclosures and the following discovery requests, responses, objections, notices or any associated proof of service shall not be filed until they are used in the proceeding or the court orders their filing: (1) deposition transcripts; (2) interrogatories; (3) requests for documents, electronically stored information or things, or to permit entry upon land; (4) requests for admission; (5) notices of taking depositions or notices of serving subpoenas; and (6) privilege logs. Going forward, failure to comply with the Local Rules, the Federal Rules of Civil Procedure, and this Court's policies and procedures may |

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|            |                    | result in sanctions. Signed by Judge Kathleen M. Williams on 4/3/2019. (jws) (Entered: 04/03/2019)   |
| 04/03/2019 | 43                 | PAPERLESS ORDER TO SHOW CAUSE. The Court's Scheduling Order <a href="#">34</a> required that "[w]ithin thirty (30) days of the date of this Order, the Parties shall: select a mediator certified under Local Rule 16.2(b); schedule a time, date, and place for mediation; and jointly file a proposed order scheduling mediation." Although the Parties filed a joint motion for the Clerk to appoint a mediator and a mediator was appointed on March 14, 2019, the Parties have nonetheless failed to comply with this requirement. Accordingly, the Parties are <b>ORDERED TO SHOW CAUSE by <u>April 4, 2019 at 5:00 p.m.</u></b> as to why sanctions should not be imposed for their failure to comply with Court order. Signed by Judge Kathleen M. Williams on 4/3/2019. (jws) (Entered: 04/03/2019) |
| 04/04/2019 | <a href="#">44</a> | RESPONSE TO ORDER TO SHOW CAUSE re 43 Order to Show Cause,, by Peter Sean Brown. (Attachments: # <a href="#">1</a> Exhibit A - Notice of Filing Proposed Mediation Order, # <a href="#">2</a> Text of Proposed Order Granting Joint Motion to File Out of Time Mediation Order)(Kacou, Amien) (Entered: 04/04/2019)  |
| 04/04/2019 | 45                 | PAPERLESS ORDER SCHEDULING MEDIATION. A mediation conference in this matter shall be held with Thomas D. Lardin on <b>August 21, 2019, at 10:00 a.m.</b> , at 401 E. Las Olas Blvd, Fort Lauderdale, Florida, 33301. This date shall not be rescheduled without leave of Court, which will not be granted absent a motion setting forth good cause. The parties are responsible for ensuring that within three business days of the mediation, a mediation report is filed, indicating whether the case settled (in full or in part), was continued with the consent of the parties, or whether the mediator declared an impasse. Signed by Judge Kathleen M. Williams on 4/4/2019. (jws) (Entered: 04/04/2019)  |
| 04/17/2019 | 46                 | <b>PAPERLESS NOTICE of Hearing:</b> A Discovery Hearing is set for 5/10/2019 at 02:30 PM in Miami Division before Magistrate Judge Edwin G. Torres. (js02) (Entered: 04/17/2019)   |
| 04/17/2019 | 47                 | PAPERLESS ORDER re [D.E. 46] Notice re Hearing:<br><br>The discovery hearing previously set for 5/10/2019 is <b>RESCHEDULED</b> to 5/9/2019 at 2:30 p.m. The parties shall continue to comply with the requirements of the Order Setting   |

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|            |                    | <p>Discovery Procedures with respect to submission of materials for that hearing by 5/6/2019.</p> <p>Signed by Magistrate Judge Edwin G. Torres on 4/17/2019. (EGT) (Entered: 04/17/2019)</p>   |
| 04/26/2019 | 48                 | <p><b>PAPERLESS NOTICE of Hearing:</b> Discovery Hearing RESET for 5/7/2019 02:30 PM in Miami Division before Magistrate Judge Edwin G. Torres, James Lawrence King Federal Justice Building, 99 NE 4th Street, 10th Floor - Courtroom 5, Miami, FL 33132. (mdc) (Entered: 04/26/2019)</p>  |
| 04/30/2019 | <a href="#">49</a> | <p>MOTION to Continue <i>Hearing</i> by Richard A. Ramsay. Responses due by 5/14/2019 (Jolly, Bruce) (Entered: 04/30/2019)</p>  |
| 04/30/2019 | 50                 | <p>PAPERLESS ORDER granting <a href="#">49</a> Motion to Continue Hearing, for good cause shown in the unopposed motion:</p> <p>Discovery Hearing re-set for 5/30/2019 11:00 AM in Miami Division before Magistrate Judge Edwin G. Torres. Compliance with submission of related materials due by 5/20/2019.</p> <p>Signed by Magistrate Judge Edwin G. Torres on 4/30/2019. (EGT) (Entered: 04/30/2019)</p>                                      |
| 05/20/2019 | <a href="#">51</a> | <p>NOTICE of Compliance <i>re Discovery Hearing</i> by Peter Sean Brown re 46 Notice re Hearing, 50 Order on Motion to Continue, (Kacou, Amien) (Entered: 05/20/2019)</p>   |
| 05/20/2019 | <a href="#">52</a> | <p>Unopposed MOTION to Withdraw as Attorney by Nancy Gbana Abudu for / by Peter Sean Brown. Responses due by 6/3/2019 (Attachments: # <a href="#">1</a> Text of Proposed Order Granting Unopposed Motion to Withdraw as Counsel)(Kacou, Amien) (Entered: 05/20/2019)</p>  |
| 05/22/2019 | <a href="#">53</a> | <p>MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Jennifer K. Bracht. Filing Fee \$ 75.00 Receipt # 113C-11667685 by Peter Sean Brown. Responses due by 6/5/2019 (Attachments: # <a href="#">1</a> Certification of Jennifer K. Bracht, # <a href="#">2</a> Text of Proposed Order Granting Motion to Appear Pro Hac Vice)(Kacou, Amien) (Entered: 05/22/2019)</p> |
| 05/28/2019 | 54                 | <p><b>PAPERLESS NOTICE OF CANCELLATION OF HEARING:</b> Hearing currently set for May 30, 2019 is hereby CANCELLED. (abu) (Entered: 05/28/2019)</p>  |

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| 05/28/2019 | 55                 | <b>PAPERLESS NOTICE of Hearing:</b> The discovery hearing set for May 30, 2019 will now take place on June 13, 2019 at 3:30 P.M. The parties must still comply with the requirements found in this Court's standing Discovery Order. (abu) (Entered: 05/28/2019)  |
| 05/29/2019 | <a href="#">56</a> | NOTICE of Attorney Appearance by Daniel Boaz Tilley on behalf of Peter Sean Brown. Attorney Daniel Boaz Tilley added to party Peter Sean Brown(pty:pla). (Tilley, Daniel) (Entered: 05/29/2019)   |
| 05/30/2019 | <a href="#">57</a> | NOTICE by Richard A. Ramsay of <i>Filing Answers to Interrogatories</i> (Jolly, Bruce) (Entered: 05/30/2019)  |
| 05/31/2019 | 58                 | PAPERLESS ORDER granting <a href="#">52</a> Motion to Withdraw as Attorney. Nancy Gbana Abudu withdrawn from case as counsel for plaintiff who is separately represented by counsel in the action; granting <a href="#">53</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney(s) Jennifer K. Bracht. The Clerk shall add pro hac counsel as counsel of record for Plaintiff.<br><br>Signed by Magistrate Judge Edwin G. Torres on 5/31/2019. (EGT) (Entered: 05/31/2019)  |
| 06/10/2019 | <a href="#">59</a> | NOTICE of Compliance <i>re June 13 Discovery Hearing</i> by Peter Sean Brown re 55 Notice re Hearing, (Kacou, Amien) (Entered: 06/10/2019)  |
| 06/11/2019 | <a href="#">60</a> | MOTION to Take Deposition from Peter Sean Brown by Richard A. Ramsay. (Jolly, Bruce) (Entered: 06/11/2019)  |
| 06/13/2019 | 61                 | PAPERLESS Minute Entry for proceedings held before Magistrate Judge Edwin G. Torres: Discovery Hearing HELD on 6/13/2019. Total time in court: 1 hour: 08 minutes. Attorney Appearance(s): Daniel Boaz Tilley, Jonathan N. Soleimani, Bruce Wallace Jolly, (Digital 15:44:41 - 16:53:13) (mdc) (Entered: 06/13/2019)  |
| 06/18/2019 | <a href="#">62</a> | TRANSCRIPT of Discovery Hearing (Transcribed from the Digital Audio Recording) held on June 13, 2019, before Magistrate Judge Edwin G. Torres, 1-76 pages, Court Reporter: Lisa Edwards, 305-439-7168 / reporterlisaedwards@gmail.com. (Digital 15:44:41.) Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 7/9/2019. Redacted Transcript Deadline set for 7/19/2019. Release of Transcript Restriction set for 9/16/2019. (le) (Entered: 06/18/2019) |

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| 06/20/2019 | <a href="#">63</a> | Corrected Transcript and Notice of Correction of the Discovery Hearing (Transcribed from the Digital Audio Recording) held on June 13, 2019, before Magistrate Judge Edwin G. Torres, 1-76 pages, re: <a href="#">62</a> Transcript. Court Reporter: Lisa Edwards, 305-439-7168 / reporterlisaedwards@gmail.com. (le) (Entered: 06/20/2019)  |
| 06/25/2019 | 64                 | <b>PAPERLESS NOTICE of Hearing:</b> A Discovery Hearing is set for 7/3/2019 at 10:30 AM in Miami Division before Magistrate Judge Edwin G. Torres. (js02) (Entered: 06/25/2019)  |
| 06/25/2019 | <a href="#">65</a> | RESPONSE in Opposition re <a href="#">60</a> MOTION to Take Deposition from Peter Sean Brown filed by Peter Sean Brown. Replies due by 7/2/2019. (Kacou, Amien) (Entered: 06/25/2019)  |
| 06/27/2019 | 66                 | <b>PAPERLESS NOTICE OF CANCELLATION OF HEARING:</b> The Discovery Hearing set for 7/3/2019 at 10:30 AM is hereby CANCELLED. (abu) (Entered: 06/27/2019)  |
| 06/27/2019 | 67                 | <b>PAPERLESS NOTICE of Hearing:</b> Discovery Hearing RESET for July 11, 2019 at 01:30 PM in the Miami Division before Magistrate Judge Edwin G. Torres. (abu) (Entered: 06/27/2019)   |
| 07/08/2019 | <a href="#">68</a> | NOTICE of Compliance re <i>July 11 Discovery Hearing</i> by Peter Sean Brown re 67 Notice re Hearing (Kacou, Amien) (Entered: 07/08/2019)  |
| 07/11/2019 | <a href="#">69</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for PATRICK HAYDEN. Filing Fee \$ 75.00 Receipt # 113C-11804961 by Peter Sean Brown. Responses due by 7/25/2019 (Attachments: # <a href="#">1</a> Certification of Patrick Hayden, # <a href="#">2</a> Text of Proposed Order)(Kacou, Amien) (Entered: 07/11/2019) |
| 07/11/2019 | <a href="#">70</a> | DISCOVERY ORDER: ORDER Granting Motion to Take Deposition of Confined Person.<br><br>Signed by Magistrate Judge Edwin G. Torres on 7/11/2019. <i>See attached document for full details.</i> (EGT) (Entered: 07/11/2019)   |
| 07/11/2019 | 73                 | PAPERLESS Minute Entry for proceedings held before Magistrate Judge Edwin G. Torres: Discovery Hearing held on 7/11/2019. Total time in court: 1 hour(s) : 1 minutes. Attorney Appearance(s): Daniel Boaz Tilley, Viviana Teresa Bonilla Lopez, Bruce Wallace Jolly, (Digital 13:36:56) (mdc) (Entered: 07/19/2019)  |

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| 07/17/2019 | 71                 | <p>PAPERLESS ORDER granting <a href="#">69</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing. The Court finds that the application satisfies the requirements of S.D. Fla. Local Atty. R. 4. Therefore, the Clerk is directed to add Patrick Hayden, Esq. as counsel of record for Defendant and allow counsel to be noticed electronically on CM/ECF.</p> <p>Docket Order Signed by Magistrate Judge Edwin G. Torres on 7/17/2019. (abu) (Entered: 07/17/2019)</p>  |
| 07/17/2019 | 72                 | <p>PAPERLESS ORDER granting <a href="#">69</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney Patrick Hayden.</p> <p>The Court finds that the application satisfies the requirements of S.D. Fla. Local Atty. R. 4.</p> <p>Therefore, the Clerk is directed to add Patrick Hayden, Esq. as counsel of record for Plaintiff and allow counsel to be noticed electronically on CM/ECF.</p> <p>Signed by Magistrate Judge Edwin G. Torres on 7/17/2019. (js02) (Entered: 07/17/2019)</p>                                  |
| 07/19/2019 | <a href="#">74</a> | <p>Discovery Order re July 11, 2019 Hearing. Signed by Magistrate Judge Edwin G. Torres on 7/19/2019. <i>See attached document for full details.</i> (js02) (Entered: 07/19/2019)</p>  |
| 07/23/2019 | 75                 | <p>PAPERLESS ORDER denying as moot <a href="#">60</a> Motion to Take Deposition as an Order was already entered on 7/11/2019 for the requested deposition.</p> <p>Signed by Magistrate Judge Edwin G. Torres on 7/23/2019. (EGT) (Entered: 07/23/2019)</p>   |
| 07/23/2019 | <a href="#">76</a> | <p>Unopposed MOTION to Continue <i>Trial Date and Remaining Pretrial Deadlines</i> re <a href="#">34</a> Scheduling Order,, by Peter Sean Brown. Responses due by 8/6/2019 (Attachments: # <a href="#">1</a> Text of Proposed Order Granting Unopposed Motion for Continuance of Trial and Remaining Pretrial Deadlines, # <a href="#">2</a> Affidavit of Jonathan N. Soleimani in Support of Unopposed Motion for Continuance of Trial and Remaining Pretrial Deadlines, # <a href="#">3</a> Exhibit A - Excerpts of Transcript from June 13, 2019 Discovery Hearing)(Kacou, Amien) (Entered: 07/23/2019)</p> |

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| 07/24/2019 | <a href="#">77</a> | <p>AMENDED SCHEDULING ORDER: Granted In Part: <a href="#">76</a> Unopposed MOTION to Continue <i>Trial Date and Remaining Pretrial Deadlines</i> re <a href="#">34</a> Scheduling Order,, filed by Peter Sean Brown. ( Jury Trial set for 4/13/2020 in Miami Division before Judge Kathleen M. Williams., Calendar Call set for 4/7/2020 11:00 AM before Judge Kathleen M. Williams.), Signed by Judge Kathleen M. Williams on 7/24/2019. <i>See attached document for full details.</i> (cds)</p> <p><a href="#">Pattern Jury Instruction Builder - To access the latest, up to date changes to the 11th Circuit Pattern Jury Instructions go to <a href="https://pji.ca11.uscourts.gov">https://pji.ca11.uscourts.gov</a> or click here.</a> (Entered: 07/24/2019)</p> |
| 07/29/2019 | 78                 | <p><b>PAPERLESS NOTICE of Hearing:</b> A Discovery Hearing is set for 8/2/2019 at 10:45 AM in Miami Division before Magistrate Judge Edwin G. Torres. (js02) (Entered: 07/29/2019)</p>   |
| 07/29/2019 | 79                 | <p><b>PAPERLESS NOTICE of Hearing: **TIME AND DATE CHANGE**</b> Discovery Hearing RESET for 8/16/2019 at 09:00 AM in Miami Division before Magistrate Judge Edwin G. Torres. (js02) (Entered: 07/29/2019)</p>  |
| 08/01/2019 | <a href="#">80</a> | <p>Defendant's MOTION to Change Venue by Richard A. Ramsay. Responses due by 8/15/2019 (Jolly, Bruce) (Entered: 08/01/2019)</p>  |
| 08/01/2019 | <a href="#">81</a> | <p>MOTION Motion to Dismiss for Plaintiff's Invocation of the Fifth Amendment Privilege During Deposition by Richard A. Ramsay. (Jolly, Bruce) (Entered: 08/01/2019)</p>   |
| 08/01/2019 | <a href="#">82</a> | <p>NOTICE of Attorney Appearance by Harrison Adan Joss on behalf of Richard A. Ramsay. Attorney Harrison Adan Joss added to party Richard A. Ramsay(pty:dft). (Joss, Harrison) (Entered: 08/01/2019)</p>   |
| 08/11/2019 | <a href="#">83</a> | <p>NOTICE of Compliance re August 16, 2019 Discovery Hearing by Peter Sean Brown re 79 Notice re Hearing (Kacou, Amien) (Entered: 08/11/2019)</p>  |
| 08/13/2019 | <a href="#">84</a> | <p>Joint MOTION for Extension of Time to Mediate to September 3, 2019 by Peter Sean Brown. (Attachments: # <a href="#">1</a> Affidavit of Jonathan N. Soleimani in support of Joint Motion to Continue Mediation Date, # <a href="#">2</a> Text of Proposed Order Granting Joint Motion to Continue Mediation Date)(Kacou, Amien) (Entered: 08/13/2019)</p>  |
| 08/13/2019 | <a href="#">85</a> | <p>NOTICE of Attorney Appearance by Anne Janet Hernandez Anderson on behalf of Peter Sean Brown. Attorney Anne Janet</p>   |

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|            |                    | Hernandez Anderson added to party Peter Sean Brown(pty:pla). (Hernandez Anderson, Anne) (Entered: 08/13/2019)   |
| 08/14/2019 | 86                 | PAPERLESS ORDER granting <a href="#">84</a> Joint Motion for Extension of Time to Mediate. The Parties shall attend mediation on September 3, 2019, at 10:00 a.m. and shall file their mediation report on that date. Mediation Deadline 9/3/2019. Signed by Judge Kathleen M. Williams on 8/14/2019. (jws) (Entered: 08/14/2019)   |
| 08/15/2019 | <a href="#">87</a> | RESPONSE in Opposition re <a href="#">80</a> Defendant's MOTION to Change Venue filed by Peter Sean Brown. Replies due by 8/22/2019. (Tilley, Daniel) (Entered: 08/15/2019)   |
| 08/15/2019 | <a href="#">88</a> | RESPONSE in Opposition re <a href="#">81</a> MOTION Motion to Dismiss for Plaintiff's Invocation of the Fifth Amendment Privilege During Deposition filed by Peter Sean Brown. Replies due by 8/22/2019. (Attachments: # <a href="#">1</a> Declaration of J. Soleimani in support of Plaintiff's Opposition to Motion to Dismiss, # <a href="#">2</a> Exhibit A - Transcript of Plaintiff's Deposition, # <a href="#">3</a> Exhibit B - Dkt. 51 - 2019.05.20 - Notice of Compliance, # <a href="#">4</a> Exhibit C - Dkt. 59 - 2019.06.10 - Amended Notice of Compliance, # <a href="#">5</a> Exhibit D - Dkt. 68 - 2019.07.08 - Notice of Compliance, # <a href="#">6</a> Exhibit E - Dkt. 83 - 2019.08.11 - Notice of Compliance, # <a href="#">7</a> Exhibit F - 2019.04.09 - Plaintiff's Meet and Confer Email with Defendant Regarding Discovery, # <a href="#">8</a> Exhibit G - 2019.04.16 - Plaintiff's Email re Lingering Disputes and Hearing with J. Torres, # <a href="#">9</a> Exhibit H - 2019.06.26 - Plaintiff's Discovery Letter re Defendant's Failure to Comply with June 13 Bench Rulings, # <a href="#">10</a> Exhibit I - Dkt. 74 - 2019.07.19 - Order Granting in Part Plaintiff's Motion to Compel, # <a href="#">11</a> Exhibit J - 2019.07.23 - Plaintiff's Letter Regarding Productions and Responses Ordered by Court on July 11, 2019)(Tilley, Daniel) (Entered: 08/15/2019) |
| 08/16/2019 | 89                 | PAPERLESS ORDER SETTING HEARING. A hearing is SET as to <a href="#">80</a> Defendant's Motion to Change Venue and <a href="#">81</a> Defendant's Motion to Dismiss for Plaintiff's Invocation of the Fifth Amendment Privilege During Deposition for <b>September 13, 2019 at 1:00 PM</b> in the Miami Division, 400 N. Miami Ave., Miami, FL 33128, Courtroom 11-3, before Judge Kathleen M. Williams. Signed by Judge Kathleen M. Williams on 8/16/2019. (jws) (Entered: 08/16/2019)  |
| 08/16/2019 | 90                 | PAPERLESS Minute Entry for proceedings held before Magistrate Judge Edwin G. Torres: Discovery Hearing held on 8/16/2019. Total time in court: 59 minutes. Attorney Appearance(s): Daniel   |

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|            |                    | Boaz Tilley, Viviana Teresa Bonilla Lopez, Bruce Wallace Jolly, (Digital 09:10:01) (mdc) (Entered: 08/16/2019)   |
| 08/16/2019 | <a href="#">91</a> | NOTICE by Peter Sean Brown of <i>Motion to Excuse Physical Presence at Mediation</i> (Attachments: # <a href="#">1</a> Exhibit Decl. of S. Rich ISO Pl.'s Mot. to Excuse Physical Presence at Mediation, # <a href="#">2</a> Exhibit Ex. A to SMR Decl - 8.14.19 Email from B Jolly to S Joleimani, # <a href="#">3</a> Exhibit Ex. B to SMR Decl - 8.12.19 Email from S Rich to B Jolly, # <a href="#">4</a> Exhibit Ex. C to SMR Decl - 8.13.19 Email from S Rich to B Jolly, # <a href="#">5</a> Exhibit Ex. D to SMR Decl - 8.12.19 Email from B Jolly to J Soleimani, # <a href="#">6</a> Exhibit Ex. E to SMR Decl - 8.13.19 Email from B Jolly to J Soleimani) (Bonilla Lopez, Viviana) (Entered: 08/16/2019) |
| 08/19/2019 | 92                 | PAPERLESS ORDER GRANTING MOTION. THIS MATTER is before the Court on Plaintiff's <a href="#">91</a> motion to be excused from physically appearing at mediation. Upon a review of the record and the motion, it is ORDERED that Plaintiff's motion is GRANTED and Plaintiff is excused from physically appearing at mediation on September 3, 2019. Plaintiff's counsel shall make reasonable efforts to arrange for Plaintiff to appear via telephone or video conference during mediation. Signed by Judge Kathleen M. Williams on 8/19/2019. (jws) (Entered: 08/19/2019)   |
| 08/22/2019 | <a href="#">93</a> | REPLY to Response to Motion re <a href="#">80</a> Defendant's MOTION to Change Venue filed by Richard A. Ramsay. (Joss, Harrison) (Entered: 08/22/2019)  |
| 08/22/2019 | <a href="#">94</a> | REPLY to Response to Motion re <a href="#">81</a> MOTION Motion to Dismiss for Plaintiff's Invocation of the Fifth Amendment Privilege During Deposition filed by Richard A. Ramsay. (Joss, Harrison) (Entered: 08/22/2019)  |
| 08/26/2019 | <a href="#">95</a> | ORDER denying <a href="#">80</a> Defendant's Motion to Change Venue. Signed by Magistrate Judge Edwin G. Torres on 8/26/2019. <i>See attached document for full details.</i> (js02) (Entered: 08/26/2019)  |
| 08/28/2019 | <a href="#">96</a> | MOTION to Amend/Correct <i>Answer</i> by Richard A. Ramsay. Responses due by 9/11/2019 (Jolly, Bruce) (Entered: 08/28/2019)  |
| 08/28/2019 | 97                 | PAPERLESS ORDER denying <a href="#">96</a> Defendant's Motion to Amend Answer. Defendant's motion to amend his answer to include a counterclaim for costs of incarceration pursuant to Florida state law is DENIED. The Parties' motions to amend pleadings were due on April 2, 2019 and discovery is due November 18, 2019. <i>See Mingo v. Sugar Cane Growers Co-Op of Fla.</i> , 864 F.2d 101, 102 (11th Cir. 1989) (holding that "[t]he district court possesses the  |

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|            |                    | <p>inherent power to police its docket"). District courts have "unquestionable" authority to control their own dockets. <i>Canada v. Mathews</i>, 449 F.2d 253, 255 (5th Cir. 1971). "[T]he schedule set forth by the Court may only be modified for good cause and with the court's consent... To establish good cause, the party seeking the extension must establish that the schedule could not be met despite the party's diligence." <i>Ashmore v. Sec'y, Dep't of Transp.</i>, 503 F. App'x 683, 685 (11th Cir. 2013). Therefore, the Court finds that good cause has not been shown as to why Defendant should be permitted to file an untimely, unrelated counterclaim at this late stage of the litigation. Signed by Judge Kathleen M. Williams on 8/28/2019. (jws) (Entered: 08/28/2019)</p> |
| 08/29/2019 | <a href="#">98</a> | <p>Second MOTION for Extension of Time to Mediate by Peter Sean Brown. (Attachments: # <a href="#">1</a> Affidavit of S. Rich ISO Joint Emergency Motion for Extension of Mediation Deadlines Due to Hurricane Dorian, # <a href="#">2</a> Text of Proposed Order Granting Joint Emergency Motion for Extension of Mediation Deadlines Due to Hurricane Dorian)(Kacou, Amien) (Entered: 08/29/2019)</p>  |
| 09/02/2019 | <a href="#">99</a> | <p>NOTICE by Peter Sean Brown <i>JOINT NOTICE OF CANCELLATION OF MEDIATION DUE TO EFFECTS OF HURRICANE DORIAN</i> (Hernandez Anderson, Anne) (Entered: 09/02/2019)</p>   |
| 09/04/2019 | 100                | <p>PAPERLESS ORDER granting <a href="#">98</a> Joint Motion for Extension of Time to Mediate. The Parties' motion for an extension of time to mediate due to weather conditions is GRANTED nunc pro tunc. Within three (3) days of the date of this Order, the Parties shall: select a mediator certified under Local Rule 16.2(b); schedule a time, date, and place for mediation; and jointly file a proposed order scheduling mediation as shown on the Sample Form Order Scheduling Mediation found in the Forms located on the Court's website. The Parties shall complete mediation and file a notice indicating whether this case settled in full or in part by <b>October 4, 2019</b>. Signed by Judge Kathleen M. Williams on 9/4/2019. (jws) (Entered: 09/04/2019)</p>                         |
| 09/04/2019 |                    | <p>PAPERLESS ORDER RESETTING HEARING. <b>**TIME CHANGE ONLY**</b> The hearing as to <a href="#">81</a> Defendant's Motion to Dismiss is RESET for September 13, 2019 at 2:00 PM in the Miami Division, 400 N. Miami Ave., Miami, FL 33128, Courtroom 11-3, before Judge Kathleen M. Williams. Signed by Judge Kathleen M. Williams on 9/4/2019. (jws) (Entered: 09/04/2019)</p>  |

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| 09/06/2019 | <a href="#">101</a> | DISCOVERY ORDER re August 16, 2019 hearing.<br><br>Signed by Magistrate Judge Edwin G. Torres on 9/6/2019. <i>See attached document for full details.</i> (EGT) (Entered: 09/06/2019)   |
| 09/06/2019 | <a href="#">102</a> | NOTICE of Mediator Selection and Hearing. Added Thomas D. Lardin. Mediation Hearing set for 9/26/2019 at 10:00 a.m.. (Attachments: # <a href="#">1</a> Text of Proposed Order Scheduling Mediation)(Tilley, Daniel) (Entered: 09/06/2019)   |
| 09/06/2019 | <a href="#">103</a> | MOTION to Withdraw as Attorney by Viviana Bonilla Lopez for / by Peter Sean Brown. Responses due by 9/20/2019 (Attachments: # <a href="#">1</a> Text of Proposed Order Granting V. Bonilla Lopez Motion to Withdraw)(Tilley, Daniel) (Entered: 09/06/2019)  |
| 09/10/2019 | <a href="#">104</a> | TRANSCRIPT of Hearing held on 8/16/19 before Magistrate Judge Edwin G. Torres, 1-50 pages, Court Reporter: Joanne Mancari, 305-523-5635. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 10/1/2019. Redacted Transcript Deadline set for 10/11/2019. Release of Transcript Restriction set for 12/9/2019. (hh) (Entered: 09/10/2019)   |
| 09/13/2019 | 105                 | PAPERLESS ORDER granting <a href="#">103</a> Motion to Withdraw as Attorney. Viviana Teresa Bonilla Lopez is withdrawn from this case. Plaintiff remains represented by other counsel. Signed by Judge Kathleen M. Williams on 9/13/2019. (jws) (Entered: 09/13/2019)   |
| 09/13/2019 | 106                 | PAPERLESS ORDER denying <a href="#">81</a> Defendant's Motion to Dismiss. For the reasons stated in open court today, September 13, 2019, Defendant's motion to dismiss with prejudice Plaintiff's claims is DENIED. On or before September 23, 2019, the Parties shall confer to discuss any outstanding questions related to Plaintiff's invocation of his 5th Amendment rights during his deposition. If the Parties cannot agree on exchanging any remaining, necessary information, Defendant shall file a motion to compel listing specific questions to which he seeks answers, which will be ruled on by Judge Torres in due course. Signed by Judge Kathleen M. Williams on 9/13/2019. (jws) (Entered: 09/13/2019) |
| 09/13/2019 | 107                 | PAPERLESS Minute Entry for proceedings held before Judge Kathleen M. Williams: Status Conference held on 9/13/2019. Counsel of record present. Court Reporter: Patricia Sanders, 305-   |

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|            |                     | 523-5548 / Patricia_Sanders@flsd.uscourts.gov. (mso) (Entered: 09/13/2019)  |
| 09/24/2019 | <a href="#">108</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Andrew C. Bernstein. Filing Fee \$ 75.00 Receipt # 113C-12009935 by Peter Sean Brown. Responses due by 10/8/2019 (Tilley, Daniel) (Entered: 09/24/2019)   |
| 10/02/2019 | <a href="#">109</a> | FINAL MEDIATION REPORT by James B. Chaplin. Disposition: Case did not settle.(Chaplin, James) (Entered: 10/02/2019)   |
| 10/08/2019 | 110                 | PAPERLESS ORDER granting <a href="#">108</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney(s) Andrew C. Bernstein. The Clerk shall add pro hac counsel as co-counsel of record for Plaintiff.<br><br>Signed by Magistrate Judge Edwin G. Torres on 10/8/2019. (EGT) (Entered: 10/08/2019)  |
| 10/23/2019 | 111                 | <b>PAPERLESS NOTICE of Hearing:</b> A discovery hearing has been set for November 8, 2019 at 02:30 PM in the Miami Division before Magistrate Judge Edwin G. Torres. (abu) (Entered: 10/23/2019)  |
| 10/29/2019 | <a href="#">112</a> | STIPULATION Motion RE: <i>Stipulated Protective Order</i> by Peter Sean Brown (Kacou, Amien)Text Modified on 10/29/2019 (cqs). (Entered: 10/29/2019)  |
| 10/31/2019 | <a href="#">113</a> | ORDER approving and granting <a href="#">112</a> Motion for Stipulated Protective Order.<br><br>Signed by Magistrate Judge Edwin G. Torres on 10/31/2019. <i>See attached document for full details.</i> (EGT) (Entered: 10/31/2019)  |
| 10/31/2019 | <a href="#">114</a> | Second MOTION to Continue <i>Trial and Remaining Pretrial Deadlines (Unopposed)</i> by Peter Sean Brown. Responses due by 11/14/2019 (Attachments: # <a href="#">1</a> Affidavit of Jason Kim in support of Second Unopposed Motion to Continue Trial and Remaining Pretrial Deadlines, # <a href="#">2</a> Text of Proposed Order Granting Second Unopposed Motion to Continue Trial and Remaining Pretrial Deadlines)(Kacou, Amien) (Entered: 10/31/2019) |
| 11/01/2019 | 115                 | PAPERLESS ORDER granting <a href="#">114</a> Plaintiff's Unopposed Motion to Continue Deadlines. Plaintiff's unopposed motion to extend   |

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|            |                     | <p>various deadlines in the Scheduling Order and reset trial is GRANTED. The Scheduling Order is amended as follows: Calendar Call is RESET for July 14, 2020 at 11:00 AM in the Miami Division before Judge Kathleen M. Williams. Trial is RESET for July 20, 2020 at 9:00 AM in the Miami Division before Judge Kathleen M. Williams.</p> <p>By January 21, 2020, the Parties shall complete all discovery, including expert discovery. By February 18, 2020, the Parties shall file all dispositive pre-trial motions and memoranda of law. By April 27, 2020, the Parties shall each file one motion in limine. By May 21, 2020, the Parties shall file their joint pretrial stipulation, witness lists, and exhibit lists. The Parties shall also file final proposed jury instructions or conclusions of law (for non-jury trials). By May 21, 2020, the Parties shall submit their deposition designations. Signed by Judge Kathleen M. Williams on 11/1/2019. (jws) (Entered: 11/01/2019)</p> |
| 11/03/2019 | <a href="#">116</a> | <p>NOTICE of Compliance <i>re November 8, 2019 Discovery Hearing</i> by Peter Sean Brown re 111 Notice re Hearing (Kacou, Amien) (Entered: 11/03/2019)</p>  |
| 11/07/2019 | <a href="#">117</a> | <p>NOTICE of Compliance <i>Regarding November 8, 2019, Discovery Hearing and Opposition to Plaintiff's Proposed Discovery Requests</i> by Richard A. Ramsay re <a href="#">116</a> Notice of Compliance filed by Peter Sean Brown, 111 Notice re Hearing (Attachments: # <a href="#">1</a> Exhibit A. Defendant's Response to Plaintiff's First Request for Production, # <a href="#">2</a> Exhibit B. June 13, 2013, Discovery Hearing Transcript, # <a href="#">3</a> Exhibit C. Plaintiff's letter dated July 11, 2019, # <a href="#">4</a> Exhibit D. Defendant's letter dated October 3, 2019, # <a href="#">5</a> Exhibit E. Plaintiff's letter dated October 19, 2019, # <a href="#">6</a> Exhibit F. Defendant's letter dated October 22, 2019, # <a href="#">7</a> Exhibit G. Composite Exhibit G) (Jolly, Bruce) (Entered: 11/07/2019)</p>  |
| 11/14/2019 | <a href="#">118</a> | <p>TRANSCRIPT of discovery hearing held on 11-8-2019 before Magistrate Judge Edwin G. Torres, 1-28 pages, Court Reporter: Dawn Savino (Whitmarsh), 305-523-5598 / Dawn_Savino@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 12/5/2019. Redacted Transcript Deadline set for 12/16/2019. Release of Transcript Restriction set for 2/12/2020. (dwh) (Entered: 11/14/2019)</p>  |

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| 11/20/2019 | 119                 | <b>PAPERLESS NOTICE of Hearing:</b> A Discovery Hearing is set for 1/10/2020 at 02:30 PM in Miami Division before Magistrate Judge Edwin G. Torres. (js02) (Entered: 11/20/2019)  |
| 11/20/2019 | <a href="#">120</a> | DISCOVERY ORDER re 11/8/19 discovery hearing.<br><br>Signed by Magistrate Judge Edwin G. Torres on 11/20/2019. <i>See attached document for full details.</i> (EGT) (Entered: 11/20/2019)   |
| 11/25/2019 | <a href="#">121</a> | NOTICE of Change of Address by Anne Janet Hernandez Anderson (Hernandez Anderson, Anne) (Entered: 11/25/2019)   |
| 12/19/2019 | <a href="#">122</a> | NOTICE of Change of Address by Amien Kacou (Kacou, Amien) (Entered: 12/19/2019)   |
| 12/20/2019 | 123                 | CLERK'S NOTICE - Attorney Admissions has updated address information for attorney(s) Jennifer K. Bracht re <a href="#">122</a> Notice of Change of Address. (cco) (Entered: 12/20/2019)   |
| 01/06/2020 | 124                 | <b>PAPERLESS NOTICE OF CANCELLATION OF HEARING:</b> The Discovery Hearing set for January 10, 2020 at 2:30 PM is hereby CANCELLED upon notice by the parties that the underlying discovery dispute has been resolved. (js02) (Entered: 01/06/2020)  |
| 02/18/2020 | <a href="#">125</a> | Plaintiff's MOTION to Seal <i>ICE Materials</i> per Local Rule 5.4 by Peter Sean Brown. (Attachments: # <a href="#">1</a> Text of Proposed Order) (Tilley, Daniel) (Entered: 02/18/2020)  |
| 02/18/2020 | <a href="#">126</a> | Plaintiff's MOTION for Summary Judgment <i>and Memorandum of Law</i> by Peter Sean Brown. Responses due by 3/3/2020 (Tilley, Daniel) (Entered: 02/18/2020)  |
| 02/18/2020 | <a href="#">127</a> | MOTION for Summary Judgment by Richard A. Ramsay. Responses due by 3/3/2020 (Joss, Harrison) (Entered: 02/18/2020)  |
| 02/18/2020 | <a href="#">128</a> | Statement of: Material Facts in Support of His Motion for Final Summary Judgment by Richard A. Ramsay re <a href="#">127</a> MOTION for Summary Judgment (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Exhibit C, # <a href="#">4</a> Exhibit D, # <a href="#">5</a> Exhibit E, # <a href="#">6</a> Exhibit F, # <a href="#">7</a> Exhibit G, # <a href="#">8</a> Exhibit H, # <a href="#">9</a> Exhibit I, # <a href="#">10</a> Exhibit J, # <a href="#">11</a> Exhibit K, # <a href="#">12</a> Exhibit L, # <a href="#">13</a> Exhibit M, # <a href="#">14</a> Exhibit N, # <a href="#">15</a> Exhibit O, # <a href="#">16</a> Exhibit P, # <a href="#">17</a> Exhibit Q)(Joss, Harrison) Modified by restricting Exhibits C,F,G pending the Motion to Seal on 2/20/2020 (nc). Modified to restrict main document per order DE 141 (cbr). (Entered: 02/18/2020) |

02/18/2020

[129](#)

Statement of: Undisputed Material Facts *in Support of Plaintiff's Motion for Summary Judgment* by Peter Sean Brown re [126](#)

Plaintiff's MOTION for Summary Judgment *and Memorandum of Law* (Attachments: # [1](#) Exhibit Ex. A - Defendants Answer (ECF No. 31) (Jan. 2, 2019), # [2](#) Exhibit Ex. B - Judge Torres Order (ECF No. 101) (Sept. 6, 2019), # [3](#) Exhibit Ex. C - Plaintiffs First Set of Requests for Admission to Defendant (Feb. 20, 2019), # [4](#) Exhibit Ex. D - Defendant's Answers to Plaintiff's First Set of Request for Admissions (Mar. 19, 2019), # [5](#) Exhibit Ex. E - Plaintiff's First Set of Interrogatories to Defendant (Feb. 26, 2019), # [6](#) Exhibit Ex. F - Defendant's Answers to Plaintiff's First Set of Interrogatories (May 30, 2019), # [7](#) Exhibit Ex. G - Defendant's Answers to Plaintiff's Second Set of Request for Admissions (July 18, 2019), # [8](#) Exhibit Ex. H -

Declaration of Peter Sean Brown (Feb. 12, 2020), # [9](#) Exhibit Ex. I - Major Timothy Age 30(b)(6) Dep. Tr. (July 16, 2019)\_Redacted, # [10](#) Exhibit Ex. J - Major Timothy Age 30(b)(6) Dep. Tr. (Dec. 11, 2019), # [11](#) Exhibit Ex. K - Age 30(b)(6) Dep. (Dec. 11, 2019) Ex. 2 (BOA), # [12](#) Exhibit Ex. L - Age 30(b)(6) Dep. (Dec. 11, 2019) Ex. 3 (Email from E. Werbeck to S. Reitz (Mar. 5, 2018)), # [13](#) Exhibit Ex. M - Age 30(b)(6) Dep. (Dec. 11, 2019) Ex. 4 (Letter from L. Graybill et al. to R. Ramsay (Dec. 4,

2019)), # [14](#) Exhibit Ex. N - Age 30(b)(6) Dep. (Dec. 11, 2019) Ex. 6 (Florida Sheriffs Association Legal Alert), # [15](#) Exhibit Ex. O - Plaintiff Peter Brown Dep. Tr. (July 17, 2019)\_Redacted, # [16](#) Exhibit Ex. P - Officer Polly Deihl Dep. Tr. (July 18, 2019), # [17](#) Exhibit Ex. Q - Jamie Denton 30(b)(6) Dep. Tr. (July 16, 2019)\_Redacted, # [18](#) Exhibit Ex. R - Denton 30(b)(6) Dep. (July 16, 2019) Ex. 5 (MCSO Bureau Directive 2-013), # [19](#) Exhibit Ex. S - Denton 30(b)(6) Dep. (July 16, 2019) Ex. 6 (MCSO Inmate Records)\_Redacted, # [20](#) Exhibit Ex. T - Jamie Denton 30(b)(6) Dep. Tr. (Dec. 11, 2019), # [21](#) Exhibit Ex. U - Denton 30(b)(6) Dep. (Dec. 11, 2019) Ex. 8 (Def.'s 3d Supp. Answers to Pl.'s Rogs (Oct. 15, 2019), # [22](#) Exhibit Ex. V - Denton 30(b)(6) Dep. (Dec. 11, 2019) Ex. 9 (Letter from B. Jolly to J. Soleimani (July 2, 2019))\_Redacted, # [23](#) Exhibit Ex. W - Sgt. Eyner Diaz Dep. Tr. (Oct. 17, 2019), # [24](#) Exhibit Ex. X - Lt. Joseph Linares Dep. Tr. (Oct. 17, 2019)\_Redacted, # [25](#) Exhibit Ex. Y - Linares Dep. Ex. 4 (Inmate Request Form (Apr. 16, 2018)), # [26](#) Exhibit Ex. Z - Linares Dep. Ex. 5 (Inmate Request Report), # [27](#) Exhibit Ex. AA - Linares Dep. Ex. 6 (Physical Information Form)\_Redacted, # [28](#) Exhibit Ex. BB - Linares Dep. Ex. 7 (MCSO Booking Information)\_Redacted, # [29](#) Exhibit Ex.

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|            |                     | <p>CC - Linares Dep. Ex. 8 (MCSO Master Name Index Record)_Redacted, # <a href="#">30</a> Exhibit Ex. DD - Linares Dep. Ex. 9 (Arrest Warrant)_Redacted, # <a href="#">31</a> Exhibit Ex. EE - Brooke Lynch Dep. Tr. (Jan. 7, 2020), # <a href="#">32</a> Exhibit Ex. FF - Sgt. Andrew Paskiewicz Dep. Tr. (July 19, 2019), # <a href="#">33</a> Exhibit Ex. GG - ICE Asst. Field Office Dir. Garrett Ripa Dep. Tr. (Nov. 7, 2019)_Redacted, # <a href="#">34</a> Exhibit Ex. HH - Ripa Dep. Ex. 1 (DHS Immigration Retainer Notice of Action (Form I-247A))_Redacted, # <a href="#">35</a> Exhibit Ex. II - Ripa Dep. Ex. 4 (Immigration Alien Response)_Redacted, # <a href="#">36</a> Exhibit Ex. JJ - Ripa Dep. Ex. 7 (PCQS Report)_Redacted, # <a href="#">37</a> Exhibit Ex. KK - Ripa Dep. Ex. 8 (EOIR Report)_Redacted, # <a href="#">38</a> Exhibit Ex. LL - Ripa Dep. Ex. 15 (4.27.18 EARM Case Comments)_Redacted, # <a href="#">39</a> Exhibit Ex. MM - Ripa Dep. Ex. 16 (Email from L. Cabarcas to G. Pederson (Apr. 26, 2018))_Redacted, # <a href="#">40</a> Exhibit Ex. NN - Ripa Dep. Ex. 17 (12.10.18 EARM Case Comments)_Redacted, # <a href="#">41</a> Exhibit Ex. OO - Release Sheet, # <a href="#">42</a> Exhibit Ex. PP - Property Report_Redacted, # <a href="#">43</a> Exhibit Ex. QQ - Booking Information_Redacted, # <a href="#">44</a> Exhibit Ex. RR - Offense Report_Redacted, # <a href="#">45</a> Exhibit Ex. SS - Arrest Report_Redacted, # <a href="#">46</a> Exhibit Ex. TT - Driver and Vehicle Information Database (DAVID) Record for Peter Brown_Redacted, # <a href="#">47</a> Exhibit Ex. UU - Complaint (ECF No. 1) (Dec. 3, 2018)(Tilley, Daniel) (Entered: 02/18/2020)</p> |
| 02/18/2020 | <a href="#">130</a> | Unopposed MOTION to File Exhibits "D" and "Q" Conventionally re <a href="#">128</a> Statement, by Richard A. Ramsay. (Joss, Harrison) (Entered: 02/18/2020)   |
| 02/18/2020 | 131                 | PAPERLESS ORDER granting <a href="#">130</a> Defendant's Unopposed Motion. Defendant's motion to file two exhibits to his motion for summary judgment conventionally is GRANTED. Exhibits D and Q to Defendant's motion for summary judgment shall be filed conventionally by February 21, 2020. Signed by Judge Kathleen M. Williams on 2/18/2020. (jws) (Entered: 02/18/2020)   |
| 02/18/2020 | 132                 | PAPERLESS ORDER granting <a href="#">125</a> Plaintiff's Unopposed Motion to Seal. Plaintiff shall file the exhibits listed in the motion to seal under seal and such exhibits shall remain sealed until further order of this Court. Signed by Judge Kathleen M. Williams on 2/18/2020. (jws) (Entered: 02/18/2020)  |
| 02/19/2020 |                     | SYSTEM ENTRY - Docket Entry 133 [misc] restricted/sealed until further notice. (1349805) (Entered: 02/19/2020)  |

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| 02/19/2020 | <a href="#">134</a> | MOTION for Leave to File Under Seal re <a href="#">128</a> Statement, by Richard A. Ramsay. (Joss, Harrison) (Entered: 02/19/2020)   |
| 02/19/2020 | <a href="#">135</a> | MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for My Khanh Ngo. Filing Fee \$ 75.00 Receipt # AFLSDC-12476870 by Peter Sean Brown. Responses due by 3/4/2020 (Attachments: # <a href="#">1</a> Certification Rule 4(b), # <a href="#">2</a> Text of Proposed Order)(Kacou, Amien) (Entered: 02/19/2020)  |
| 02/20/2020 | <a href="#">136</a> | (STRICKEN) NOTICE by Richard A. Ramsay re <a href="#">128</a> Statement,, of <i>Conventionally Filing Exhibits "D" and "Q" in Support of Defendant Ramsay's Statement of Facts</i> (Joss, Harrison)Text Modified on 2/20/2020 (cqs). (Entered: 02/20/2020)   |
| 02/20/2020 | 137                 | Clerks Notice to Filer re <a href="#">136</a> Notice (Other). <b>Conventional Filing Filed Electronically</b> ; CORRECTIVE ACTION REQUIRED - The Filer failed to submit the document in the conventional paper format. The Filer must file a Notice of Striking, then refile the document in the conventional paper format. (cqs) (Entered: 02/20/2020)  |
| 02/20/2020 | <a href="#">138</a> | NOTICE by Richard A. Ramsay re <a href="#">136</a> Notice (Other) of <i>Striking</i> (Joss, Harrison) (Entered: 02/20/2020)  |
| 02/21/2020 | 139                 | PAPERLESS ORDER granting <a href="#">134</a> Unopposed Motion to Seal. Defendant's motion to seal certain exhibits to his motion for summary judgment is GRANTED. Defendant shall refile redacted versions of exhibits C, G and F to the docket and shall file unredacted version of these exhibits under seal. These exhibits shall remain sealed until further order by this Court. Signed by Judge Kathleen M. Williams on 2/21/2020. (jws) (Entered: 02/21/2020) |
| 02/21/2020 | <a href="#">140</a> | Unopposed MOTION for Leave to File <i>Defendant's Statement of Facts in Support of Final Summary Judgment Under Seal</i> by Richard A. Ramsay. (Attachments: # <a href="#">1</a> Exhibit A)(Joss, Harrison) (Entered: 02/21/2020)  |
| 02/21/2020 | 141                 | PAPERLESS ORDER granting <a href="#">140</a> Unopposed Motion for Leave to File Under Seal. Defendant's motion to seal the statement of facts in support of his motion for summary judgment is GRANTED. Defendant shall refile a redacted version of the statement of facts to the docket and shall file an unredacted version of the statement of facts under seal. Defendant's statement of facts shall remain sealed until further order by this Court.           |

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|            |                     | Signed by Judge Kathleen M. Williams on 2/21/2020. (jws)<br>(Entered: 02/21/2020)  |
| 02/21/2020 | <a href="#">142</a> | NOTICE by Richard A. Ramsay re <a href="#">128</a> Statement,, <i>Filing Exhibits Under Seal</i> (Attachments: # <a href="#">1</a> Exhibit C, # <a href="#">2</a> Exhibit F, # <a href="#">3</a> Exhibit G) (Joss, Harrison) (Entered: 02/21/2020)   |
| 02/21/2020 | <a href="#">143</a> | NOTICE by Richard A. Ramsay re 141 Order on Motion for Leave to File,, <i>Defendant's Redacted Statement of Facts in Support of Defendant's Motion for Final Summary Judgment [DE 127]</i> (Attachments: # <a href="#">1</a> Defendant's Redacted Statement of Facts) (Joss, Harrison) (Entered: 02/21/2020)   |
| 02/25/2020 |                     | SYSTEM ENTRY - Docket Entry 144 [misc] restricted/sealed until further notice. (1777513) (Entered: 02/25/2020)   |
| 02/25/2020 | <a href="#">145</a> | Unopposed MOTION for Extension of Time to File Response/Reply/Answer as to <a href="#">129</a> Statement,,,,,,,,,,,,,,,,,,,,, <a href="#">126</a><br><br>Plaintiff's MOTION for Summary Judgment <i>and Memorandum of Law</i> by Richard A. Ramsay. (Joss, Harrison) (Entered: 02/25/2020)   |
| 02/25/2020 | 146                 | PAPERLESS ORDER granting <a href="#">135</a> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney My Khanh Ngo. The Clerk shall add pro hac counsel as co-counsel for Plaintiff.<br><br>Signed by Magistrate Judge Edwin G. Torres on 2/25/2020. (EGT) (Entered: 02/25/2020)                                     |
| 02/25/2020 | 147                 | PAPERLESS ORDER. The Parties' agreed motion <a href="#">145</a> to extend the briefing deadlines for their cross motions for summary judgment is GRANTED. The Parties shall file their responses in opposition to the motions for summary judgment by March 9, 2020 and shall file their replies by March 19, 2020. Signed by Judge Kathleen M. Williams on 2/25/2020. (jws) (Entered: 02/25/2020) |
| 03/09/2020 | <a href="#">148</a> | RESPONSE in Opposition re <a href="#">127</a> MOTION for Summary Judgment filed by Peter Sean Brown. Replies due by 3/16/2020. (Tilley, Daniel) (Entered: 03/09/2020)  |
| 03/09/2020 | <a href="#">149</a> | RESPONSE to Motion re <a href="#">126</a> Plaintiff's MOTION for Summary Judgment <i>and Memorandum of Law Defendant's Response to Plaintiff's Statement of Undisputed Material Fact [DE</i>   |

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|            |                     | <i>129]</i> filed by Richard A. Ramsay. Replies due by 3/16/2020. (Attachments: # <a href="#">1</a> Exhibit A, # <a href="#">2</a> Exhibit B, # <a href="#">3</a> Exhibit C, # <a href="#">4</a> Exhibit D)(Joss, Harrison) (Entered: 03/09/2020)  |
| 03/09/2020 | <a href="#">150</a> | RESPONSE in Opposition re <a href="#">126</a> Plaintiff's MOTION for Summary Judgment <i>and Memorandum of Law</i> filed by Richard A. Ramsay. Replies due by 3/16/2020. (Joss, Harrison) (Entered: 03/09/2020)  |
| 03/09/2020 | <a href="#">151</a> | Statement of: Material Facts in Response to Defendant's Statement of Material Facts by Peter Sean Brown re <a href="#">128</a> Statement,, (Tilley, Daniel) (Entered: 03/09/2020)  |
| 03/16/2020 | <a href="#">152</a> | Defendant's REPLY to <a href="#">127</a> MOTION for Summary Judgment by Richard A. Ramsay. (Joss, Harrison) (Entered: 03/16/2020)  |
| 03/19/2020 | <a href="#">153</a> | Unopposed MOTION for Leave to File <i>DE 149-4 Exhibit "D" of Defendant's Response to Plaintiff's Undisputed Statement of Material Facts in Support of Final Summary Judgment [DE 129] Under Seal, or in the Alternative, to Direct the Clerk of Court to Seal 149-4 Exhibit "D" from Public Review</i> by Richard A. Ramsay. (Joss, Harrison) (Entered: 03/19/2020) |
| 03/19/2020 | <a href="#">154</a> | REPLY to Response to Motion re <a href="#">126</a> Plaintiff's MOTION for Summary Judgment <i>and Memorandum of Law</i> filed by Peter Sean Brown. (Tilley, Daniel) (Entered: 03/19/2020)  |
| 03/19/2020 | <a href="#">155</a> | Statement of: Material Facts in Reply to <i>Defendant's Additional Statement of Facts in Opposition</i> by Peter Sean Brown re <a href="#">149</a> Response to Motion, (Tilley, Daniel) (Entered: 03/19/2020)  |
| 03/20/2020 | 156                 | PAPERLESS ORDER granting <a href="#">153</a> Defendant's Unopposed Motion for Leave to File Under Seal. The Clerk is ORDERED to seal Exhibit D to docket entry 149 [149-4]. This document shall remain sealed until further order. Signed by Judge Kathleen M. Williams on 3/20/2020. (jws) (Entered: 03/20/2020)  |
| 03/27/2020 | <a href="#">157</a> | Unopposed MOTION to Stay <i>Pretrial and Trial Deadlines</i> by Peter Sean Brown. Responses due by 4/10/2020 (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tilley, Daniel) (Entered: 03/27/2020)   |
| 03/30/2020 | 158                 | PAPERLESS ORDER granting in part and denying in part <a href="#">157</a> Plaintiff's Unopposed Motion to Stay. The deadlines in the Court's scheduling order are STAYED for 60 days. By May 29, 2020, the Parties shall submit a joint proposed scheduling   |

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|            |                     | order with revised pre-trial deadlines and a proposed trial date. Signed by Judge Kathleen M. Williams on 3/30/2020. (jws) (Entered: 03/30/2020)   |
| 03/31/2020 |                     | Reset Deadlines Per DE#158 Proposed Joint Scheduling Report due by 5/29/2020 (cqs) (Entered: 03/31/2020)   |
| 04/23/2020 | <a href="#">159</a> | Notice of Supplemental Authority by Peter Sean Brown (Tilley, Daniel) (Entered: 04/23/2020)  |
| 04/30/2020 | <a href="#">160</a> | NOTICE by Richard A. Ramsay re <a href="#">159</a> Notice of Supplemental Authority <i>Notice of Supplemental Authority</i> (Joss, Harrison) (Entered: 04/30/2020)   |
| 05/26/2020 | <a href="#">161</a> | Joint SCHEDULING REPORT - <b>Rule 16.1</b> by Peter Sean Brown (Attachments: # <a href="#">1</a> Supplement Joint Proposed Schedule, # <a href="#">2</a> Text of Proposed Order)(Kacou, Amien) (Entered: 05/26/2020)   |
| 05/27/2020 | 162                 | PAPERLESS ORDER GRANTING JOINT MOTION. The Parties' joint motion to continue the stay in this case is GRANTED. This case remains STAYED through July 29, 2020. On or before that date, the Parties shall submit a joint proposed scheduling order with revised pre-trial deadlines and a proposed trial date. Signed by Judge Kathleen M. Williams on 5/27/2020. (jws) (Entered: 05/27/2020)         |
| 05/28/2020 | <a href="#">163</a> | NOTICE of Attorney Appearance by Richard A. Giuffreda on behalf of Richard A. Ramsay. Attorney Richard A. Giuffreda added to party Richard A. Ramsay(pty:dft). (Giuffreda, Richard) (Entered: 05/28/2020)  |
| 06/30/2020 | <a href="#">164</a> | MOTION to Withdraw as Attorney by Bruce W. Jolly for / by Richard A. Ramsay. Responses due by 7/14/2020 (Jolly, Bruce) (Entered: 06/30/2020)   |
| 07/06/2020 | 165                 | PAPERLESS ORDER granting <a href="#">164</a> Motion to Withdraw as Attorney. Bruce Wallace Jolly withdrawn from case upon his well earned retirement, with substitute lead counsel filing a notice of appearance. Mr. Jolly is luckily free of any further obligation to dissect interrogatory responses.<br><br>Signed by Magistrate Judge Edwin G. Torres on 7/6/2020. (EGT) (Entered: 07/06/2020) |
| 07/28/2020 | <a href="#">166</a> | Joint SCHEDULING REPORT - <b>Rule 16.1</b> by Peter Sean Brown (Attachments: # <a href="#">1</a> Supplement Joint Proposed Schedule, # <a href="#">2</a> Text of Proposed Order)(Tilley, Daniel) (Entered: 07/28/2020)   |

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| 08/28/2020 | <a href="#">167</a> | <p>AMENDED SCHEDULING ORDER: Jury Trial set for 1/19/2021 in Miami Division before Judge Kathleen M. Williams., Calendar Call set for 1/12/2021 11:00 AM in Miami Division before Judge Kathleen M. Williams. Signed by Judge Kathleen M. Williams on 8/28/2020. <i>See attached document for full details.</i> (shy)</p> <p><a href="#">Pattern Jury Instruction Builder - To access the latest, up to date changes to the 11th Circuit Pattern Jury Instructions go to <a href="https://pji.ca11.uscourts.gov">https://pji.ca11.uscourts.gov</a> or click here.</a> (Entered: 08/28/2020)</p> |
| 09/22/2020 | <a href="#">168</a> | <p>Renewed MOTION to Change Venue by Richard A. Ramsay. Responses due by 10/6/2020 (Joss, Harrison) (Entered: 09/22/2020)</p>   |
| 10/06/2020 | <a href="#">169</a> | <p>RESPONSE in Opposition re <a href="#">168</a> Renewed MOTION to Change Venue filed by Peter Sean Brown. Replies due by 10/13/2020. (Tilley, Daniel) (Entered: 10/06/2020)</p>  |
| 10/13/2020 | <a href="#">170</a> | <p>REPLY to Response to Motion re <a href="#">168</a> Renewed MOTION to Change Venue filed by Richard A. Ramsay. (Joss, Harrison) (Entered: 10/13/2020)</p>   |
| 10/13/2020 | <a href="#">171</a> | <p>Unopposed MOTION to Stay <i>Pretrial and Trial Deadlines</i> by Peter Sean Brown. Responses due by 10/27/2020 (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tilley, Daniel) (Entered: 10/13/2020)</p>  |
| 10/20/2020 | <a href="#">172</a> | <p>ORDER denying <a href="#">168</a> Defendant's Motion to Change Venue with leave to renew, if necessary, at a closer date to trial.</p> <p>Signed by Magistrate Judge Edwin G. Torres on 10/20/2020. <i>See attached document for full details.</i> (js02) (Entered: 10/20/2020)</p>  |
| 10/23/2020 | 173                 | <p>PAPERLESS ORDER denying <a href="#">171</a> Motion to Stay. The Parties' Motion to Stay is <b>DENIED</b>. However, the deadlines and trial schedule set forth in the Amended Scheduling Order <a href="#">167</a></p> <p>are <b>CONTINUED</b>. The Parties shall file their Motions In Limine by <b>January 15, 2021</b>. The Parties shall file their Pretrial Stipulation and Deposition Designations by <b>February 5, 2021</b>. Signed by Judge Kathleen M. Williams on 10/23/2020. (shy) (Entered: 10/23/2020)</p>  |
| 01/06/2021 | <a href="#">174</a> | <p>Unopposed MOTION to Continue <i>Pretrial and Trial Deadlines</i> by Peter Sean Brown. Responses due by 1/20/2021 (Attachments: # <a href="#">1</a> Text of Proposed Order)(Tilley, Daniel) (Entered: 01/06/2021)</p>   |

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| 01/12/2021 | 175                 | PAPERLESS ORDER. THIS MATTER is before the Court on the Parties' Motion to Continue <a href="#">174</a> . The Motion is <b>GRANTED</b> . The Parties shall adhere to the schedule as set forth in the Motion. Calendar Call is SET for 5/18/2021 11:00 AM in Miami Division before Judge Kathleen M. Williams. Jury Trial is SET for 5/24/2021 in Miami Division before Judge Kathleen M. Williams. Signed by Judge Kathleen M. Williams on 1/12/2021. (shy) (Entered: 01/12/2021) |
| 02/08/2021 | <a href="#">176</a> | NOTICE of Attorney Appearance by Adriana Mihaela Jisa on behalf of Richard A. Ramsay. Attorney Adriana Mihaela Jisa added to party Richard A. Ramsay(pty:dft). (Jisa, Adriana) (Entered: 02/08/2021)   |
| 03/08/2021 | <a href="#">177</a> | Unopposed MOTION to Continue <i>Pretrial and Trial Deadlines</i> by Peter Sean Brown. Responses due by 3/22/2021 (Attachments: # <a href="#">1</a> Text of Proposed Order)(Kacou, Amien) (Entered: 03/08/2021)   |
| 03/11/2021 | 178                 | PAPERLESS ORDER. THIS MATTER is before the Court on the Parties' Motion to Continue <a href="#">177</a> . The Motion is <b>GRANTED</b> . The Parties shall adhere to the schedule as set forth in the Motion. Signed by Judge Kathleen M. Williams on 3/11/2021. (shy) (Entered: 03/11/2021)   |

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