

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

UNITED STATES OF AMERICA,

Plaintiff,

Civ. Case No. 12-2039 (GAG)

Vs.

COMMONWEALTH OF PUERTO RICO  
and the PUERTO RICO POLICE BUREAU,

Defendants

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**MOTION REQUESTING BRIEF STAY OF COURT PROCEEDINGS**

**TO THE HONORABLE COURT:**

**COME NOW**, the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau, (jointly, the “Commonwealth”), by and through the undersigned counsels, and hereby state and request as follows:

1. As this Court is aware, the newly elected Governor of Puerto Rico, Honorable Pedro Pierluisi, recently appointed Mr. Alexis Torres to serve as the Secretary of the Department of Public Safety, and Mr. Antonio Lopez Figueroa as the Commissioner of the Puerto Rico Police Bureau (PRPB). Neither Alexis Torres nor Antonio Lopez have been duly confirmed by the Senate of Puerto Rico. Nonetheless, the Acting DPS Secretary Torres and the Acting PRPB Commissioner have assumed their interim duties for thirteen days, or since January 2, 2021. During their short time in office, the Secretary and the Commissioner have been forced to undertake numerous, time-sensitive projects to ensure the continuity of operations in their respective government agencies. In the case of the DPS, the Secretary has engaged new staff

members which are just beginning to familiarize themselves with the wide array of pending projects and the complexities of their newly assigned office responsibilities.

2. Among the unforeseen situations that have engulfed both the acting DPS Secretary and the acting PRPB Commissioner has been an active investigation involving the recent murder of three law enforcement officers in Puerto Rico, an event that has shaken the entire Island. This dreadful event has further thwarted the capacity of both the DPS Secretary and the PRPB Commissioner to monitor numerous pending matters, including the legal services contract in connection with the case at hand.

3. Earlier today, the undersigned attorney held a conference call with counsel Luis Saucedo, United States Department of Justice, to appraise him of the status of the legal services contract, as well as to discuss any short-term benchmarks or immediate requirements relevant to the Agreement for Sustainable Reform subscribed by the parties. Counsel Saucedo was advised the Commonwealth would be requesting the Court a 30-day extension of all deadlines and to stay the proceedings to enable the DPS and the PRPB to engage the legal representation in the case at hand. Counsel Saucedo expressed concerns regarding the short-term effects a stay would have over the Agreement for Sustainable Reform. The Commonwealth, however, believes this should be sufficient time for the DPS, the PRPB, and other concerned government agencies to review and consider all relevant information relevant to the legal services contracts inasmuch as the stay requested would be brief in nature and, further, would not adversely and substantially affect the rights of the parties to the agreement.

4. Based on the above, the appearing parties respectfully request this Honorable Court to grant a 30-day extension and stay of proceedings, or until February 14, 2021, for the

Commonwealth to be able to engage the legal counsels that will continue representing them in this matter.

**WHEREFORE**, the appearing parties very respectfully request the Court to take notice of the above and Grant a 30-day extension, or until February 14, 2021, for the Commonwealth to be able to engage the legal counsels that will continue appearing in this matter.

In San Juan, Puerto Rico, this 15th day of January, 2021.

*s/Raúl E. Bandas*  
Raúl E. Bandas  
USDC-PR No. 207809

*s/Carlos M. Rivera-Vicente*  
Carlos M. Rivera-Vicente  
USDC-PR No. 126304

*s/Marta L. Rivera Ruiz*  
Marta L. Rivera Ruiz  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on this date I electronically filed the foregoing motion with the Clerk of the Court, using the CM/ECF System, which will send notification of such filing to all appearing parties and counsels using the Court's electronic system.

In San Juan, Puerto Rico, this 15th day of January 2021.

*s/Raúl E. Bandas*  
Raúl E. Bandas-del Pilar  
USDC-PR No. 207809  
Counsel for Defendants