

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

SHANE M. GATES	*	CIVIL RIGHTS: 42 U.S.C. § 1983
	*	
VERSUS	*	ACTION AS TO TREASON
	*	
JUDGE RICHARD SWARTZ, WALTER P. REED,*	*	CASE NO.: 2:13-cv-06425
ADA NICHOLAS F. NORIEA, JR., CLERK OF	*	
COURT-ST TAMMANY MARIE-ELISE PRIETO,*	*	JUDGE: SARAH VANCE
STPSO SHERIFF RODNEY "JACK" STRAIN,	*	
CAPTAIN SHERWOOD, KATHRYN LANDRY,	*	MAG. JUDGE: ALMA CHASEZ
THE OFFICE OF THE CLERK OF COURT	*	
OF ST. TAMMANY, LOUISIANA ATTORNEY	*	JURY TRIAL
GENERAL JAMES D. "BUDDY" CALDWELL,	*	
THE OFFICE OF THE LOUISIANA ATTORNEY	*	
GENERAL, THE OFFICE OF WALTER P. REED *	*	
DISTRICT ATTORNEY FOR THE PARISH OF	*	
ST TAMMANY, ADA RONNIE GRACIANETTE,*	*	
JOHN AND JANE DOES OF THE PARISH AND	*	
STATE OFFICES NAMED, AND TRAVELERS -	*	
ST PAUL INSURANCE COMPANIES	*	

MOTION TO CONTINUE AND RESET DEFENDANTS'
MOTIONS 25, 29, AND 30 UNTIL 9 APRIL 2014, FOR MEDICAL REASONS
KNOWN TO THIS HONORABLE COURT AND TO ALL COUNSEL OF RECORD

Plaintiff Shane M. Gates and counsel move the Court to continue the 26 February 2014 submission dates for defendants' Motions appearing at Rec. Doc. Nos. 25, 29, and 30. Counsel is undergoing further treatment, diagnosis, and monitoring at M.D. Anderson Cancer Center in Houston, Texas the week of 3 March 2014 and for the reasons set forth in the memorandum attached.

Respectfully submitted,
s/ Daniel G. Abel
Daniel G. Abel, LSB # 8348
2421 Clearview Parkway
Legal Department - Suite 106
Metairie, Louisiana 70001
Telephone: 504.284.8521
Facsimile: 888.577.8815

Certificate of Service
s/ Daniel G. Abel
I have filed this motion, memorandum, and proposed order electronically with the Clerk of Court and thereby served all counsel. On this 18 February 2014.

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MEMORANDUM IN SUPPORT OF COUNSEL'S
MOTION TO CONTINUE AND RESET DEFENDANTS'
MOTIONS 25, 29, AND 30 UNTIL 9 APRIL 2014, FOR MEDICAL REASONS
KNOWN TO THIS HONORABLE COURT AND TO ALL COUNSEL OF RECORD

Plaintiff Shane M. Gates and counsel move the Court to continue the 26 February 2014 submission dates for defendants' Motions appearing at Rec. Doc. Nos. 25, 29, and 30. Counsel is undergoing further treatment, diagnosis, and monitoring at M.D. Anderson Cancer Center in Houston, Texas the week of 3 March 2014 and for the reasons set forth herein.

Undersigned counsel had surgery and was diagnosed with cancer at the end of December 2014. He has been treated locally but is now scheduled to continue treatment, diagnosis, and monitoring the week of 3 March 2014. At the end of that time, his treating physician at M.D. Anderson should be able to provide a more conclusive prognosis and what the future treatment will entail. Prior to that time, the ongoing diagnosis and scope of treatment is uncertain.

Counsel has contacted certain attorneys who are considering enrolling in this matter. To date none have finalized an agreement to enroll.

Plaintiff Shane M. Gates and counsel move the Court to continue the 26 February 2014 submission dates for defendants' Motions appearing at Rec. Doc. Nos. 25, 29, and 30 and re-set the dates for 9 April 2014, at 10:00 A.M. to be submitted before Judge Sarah S. Vance.

Respectfully submitted,

Certificate of Service

s/ Daniel G. Abel

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ORDER

In light of the ongoing medical treatment and diagnosis of counsel, the Court continues the 26 February 2014 submission dates for defendants' Motions appearing at Rec. Doc. Nos. 25, 29, and 30 and re-sets the date of each for 9 April 2014, at 10:00 A.M. to be submitted before this Court.

Ordered this ___ day of _____, 2014. New Orleans, Louisiana

CHIEF JUDGE SARAH S. VANCE