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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Rev. Josephenie E. Robertson, M.T.T., *et al.*,

Plaintiffs,

v.

The Republic of Nicaragua, *et al.*,

Defendants.

Case No. 3:17-cv-00852-JST

**OPPOSITION OF DEFENDANTS
REPUBLIC OF NICARAGUA,
DANIEL ORTEGA, ROSARIO
MURILLO, AND THE
SANDINISTA PARTY TO MOTION
FOR SANCTIONS**

1 Defendants Republic of Nicaragua, Daniel Ortega, Rosario Murillo, and the Sandinista
2 Party (the “Defendants”) hereby oppose Plaintiff’s Motion for Sanctions (D.E. 82) (the
3 “Motion”).

4 The Motion appears to assert that an attorney named Armstrong Wiggins of the Indian
5 Law Resource Center’s office in Washington, D.C., had some type of *ex parte* contact with the
6 Court. Defendants see no evidence that any improper contact with the Court occurred. Nor have
7 any of the defense counsel listed below had any contact with Mr. Wiggins or directed anyone to
8 have contact with him about this matter.
9

10 Accordingly, Defendants see no basis for sanctions against anyone.

11 WHEREFORE, Defendants respectfully request that the Court deny the Motion.
12
13

14 Dated: September 19, 2017 By: /s/ Philip C. Swain
15

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FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Philip C. Swain, attest that concurrence in the filing of this document has been obtained.

/s/ Philip C. Swain
Philip C. Swain

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document, filed through the ECF system,
was served on the following pro se parties:

Josephenie Robertson

Ercell Hendy Twaska Fleurima

by regular first class mail, postage prepaid, this 19th day of September, 2017, addressed as follows:

c/o Rev. Josephenie E. Robertson, M.T.T.
1557 Jackson Street, #301
Oakland, CA 94612
(510) 410-1144

/s/ Philip C. Swain
Philip C. Swain