

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: 12-034121 (07)
Complex Litigation Unit

MARGARET J. SMITH as Managing General
Partner of P&S Associates, GENERAL
PARTNERSHIP, a Florida limited partnership,
And S&P ASSOCIATES, GENERAL
PARTNERSHIP, a Florida limited partnership;
P&S ASSOCIATES, GENERAL PARTNERSHIP,
A Florida limited partnership; and S&P
ASSOCIATES, GENERAL PARTNERSHIP,
A Florida limited partnership,
Plaintiffs,

Vs

JANET A. HOOKER CHARITABLE TRUST, a
Charitable trust, DIANE M. DEN BLEYKER, an
Individual, ETTOH LTD., a Florida limited
Partnership, et al.
Defendants.

MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE RESPONSES TO DISCOVERY REQUESTS

COME NOW, Defendants, ABRAHAM NEWMAN, RITA NEWMAN and
GERTRUDE GORDON, by and through the undersigned counsel, and file this
their Motion for Extension of Time Within Which to File Responses to Discovery
Requests and would state further as follows;

1. Defendants move for an extension of twenty (20) days within which to
file responses to Plaintiffs' Interrogatories and Request to Produce propounded on
December 13, 2013.

2. That the parties will not be prejudiced by the granting of this relief.
3. That this motion is filed in good faith and not for the purposes of delay.

WHEREFORE, Defendants, ABRAHAM NEWMAN, RITA NEWMAN and GERTRUDE GORDON, respectfully pray this Honorable Court enter an order granting the relief sought herein together with such other and further relief as this Honorable Court may deem proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was SENT VIA E-MAIL to: SEE SERVICE LIST ATTACHED; this 10 day of January, 2014.

JOSEPH P. KLAPHOLZ, P.A.
2500 Hollywood Boulevard, Suite 212
Hollywood, Florida 33020
Phone: (954)-925-3355
Fax: (954)-923-0185

By: _____
JOSEPH P. KLAPHOLZ, Esq.
Florida Bar No.: 450431
Primary email: jklap@klapholzpa.com
Secondary email: dml@klapholzpa.com

SERVICE LIST

ATTORNEYS

Leonard K. Samuels, Esq.

Etan Mark, Esq.

Steven D. Weber, Esq.

Berger Singerman, LLP

350 East Las Olas Boulevard, Suite 1000

Fort Lauderdale, Florida 33301

Secondary e-mail: lsamuels@bergensingerman.com

Secondary e-mail: emark@bergersingerman.com

e-mail: sweber@bergersingerman.com

Primary e-mail: DRT@bergersingerman.com

e-mail: VLeon@bergersingerman.com

e-mail: lwebster@bergersingerman.com

(attorneys for P&S Associates, General Partnership and S&P Associates, General Partnership)

Thomas M. Messana, Esq.

Messana, P.A.

P.O. Box 2485

Fort Lauderdale, Florida 33303-2485

Primary e-mail: tmessana@messana-law.com

(attorneys for Philip J. Von Kahle, the Conservator of the P&S Associates, General Partnership and the S&P Associates, General Partnership/Plaintiff's Attorney)

Eric N. Assouline, Esq.

Assouline & Berlowe, P.A.

213 E. Sheridan Street, Suite 3

Dania Beach, Florida 33004

E-mail: ena@assoulineberlowe.com

E-mail: ah@assoulineberlowe.com

(Attorney for Ersica P. Gianna)

Julian H. Kreeger, Esq.

2665 S. Bayshore Drive, Suite 220-14

Miami, Florida 33133-5402

E-mail: juliankreeger@gmail.com

(Attorney for James Bruce Judd and Valeria Judd)

Michael R. Casey, Esq.

1831 N.E. 38th Street, # 707

Oakland Park, Florida 33308

E-mail: mcasey666@gmail.com

(Attorney for Alex E. Molchan; Janet B. Molchan; Susan E. Molchan and Thomas Whiteman)

Daniel W. Matlow, Esq.

Emerald Lake Corporate Park, Suite 101

3109 Stirling Road

Fort Lauderdale, Florida 33312

Primary E-mail: dmatlow@danmatlow.com

Secondary E-mail: assistant@danmatlow.com

(Attorney for Herbert Irwig Revocable Trust)

Marc Stuart Dobin, Esq. and

Dobin Law Group, P.A.

500 University Boulevard, Suite 205

Jupiter, Florida 33458-2775

E-mail: MDobin@DobinLaw.com

E-mail: service@DobinLaw.com

(Attorney for Congregation of the Holy Ghost – Western Providence)

Jonathan Thomas Lieber, Esq.

Dobin Law Group, P.A.

500 University Boulevard, Suite 205

Jupiter, Florida 33458-2775

E-mail: jlieber@dobinlaw.com

E-mail: service@DobinLaw.com

(Attorney for

Thomas Louis Abrams, Esq.

1776 North Pine Island Road, Suite 309

Plantation, Florida 33322-5235

Primary E-mail: tabrams@tabramslaw.com

Secondary E-mail: fcolumbo@tabramslaw.com

(Attorney for Sam Rosen and Edith Rosen)

Ethan Mark, Esq.

Berger Singerman, LLP

1450 Brickell Avenue, Suite 1900

Miami, Florida 33131-3453

E-mail: emark@bergersingerman.com

(Attorney for Margaret J. Smith)

Peter G. Herman, Esq.

Tripp Scott

110 S.E. 6th Street, Suite 1500
Fort Lauderdale, Florida 33301

E-mail: PGH@trippscott.com

(Attorney for Steve Jacobs)

Richard T. Woulfe, Esq.

Bunnell & Woulfe, P.A.

One Financial Plaza, Suite 1000
100 S.E. 3rd Avenue

Fort Lauderdale, Florida 33394

E-mail: pleadings.RTW@bunnellwoulfe.com

(Attorney for Robert A. Uchin Revocable Trust)

Joanne Wilcomes, Esq.

McCarter & English, LLP

100 Mulberry Street

Four Gateway Center

Newark, NJ 07102

E-mail: jwilcomes@mccarter.com

(Attorney for Holy Ghost Fathers HG – Ireland/Kenema)

Michael C. Foster, Esq.

Daniels Kashtan

4000 Ponce de Leon Boulevard, Suite 800

Coral Gables, Florida 33146-1436

E-mail: mfooster@dkdr.com

(Attorney for Etohd Ltd)

Robert J. Hunt, Esq.

Debra D. Klingsberg, Esq.

Hunt & Gross, P.A.

185 N.W. Spanish River Boulevard, Suite 220

Boca Raton, Florida 33431-4230

E-mail: bohhunt@huntgross.com

E-mail: dklingsberg@huntgross.com

E-mail: eService@huntgross.com

E-mail: Sharon@huntgross.com

(Attorneys for Hampton Financial, Group, Inc.)

Ryon M. McCabe, Esq.

Evan H. Frederick, Esq.

McCabe Rabin, P.A.

1601 Forum Place, Suite 505

West Palm Beach, Florida 33401

Primary E-mail: rmccabe@mccaberabin.com

Secondary: e-filing@mccaberabin.com

Primary E-mail: efrederick@mccaberabin.com

Secondary: e-filing@mccaberabin.com

(Attorneys for Catharine Smith)