

**IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT, IN
AND FOR BROWARD COUNTY, FLORIDA**

CASE NO.: 12-034121 (07)

P&S ASSOCIATES, General Partnership, *et al.*,
Plaintiffs,

v.

JANET A. HOOKER CHARITABLE TRUST, a
charitable trust, *et al.*,

Defendants.

**PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME TO DESIGNATE EXPERT
WITNESS**

Plaintiffs, P & S Associates, General Partnership (“P&S”), and S & P Associates, General Partnership (“S&P”), (collectively and individually referred to as, the “Partnerships” or “Plaintiffs”) and Philip Von Kahle as Conservator on behalf of the Partnerships (“Conservator”), by and through their undersigned attorneys, file this Motion for an Extension of Time to Designate Expert Witness and in support thereof state:

1. The Case Management Order in this matter provides that “[P]laintiff[s] shall designate any expert expected to testify at trial and provide all information specified in CPL 7.5 by January 31, 2014.”
2. Plaintiffs are still in the process of finalizing engagement of an expert witness, and need a brief two week extension of time to make the disclosures required by the CPL 7.5.

1.

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3. Plaintiffs consequently need a brief extension of time, up to and until February 14, 2013 to provide all required information.

4. In the event that the Court grants the Motion, Plaintiffs will also consent to a two week extension of time for Defendants to make the disclosures required by CLP 7.5

5. No party will be prejudiced by the relief sought.

WHEREFORE the Plaintiffs request that this Court enter an order extending the deadline to designate any expert expected to be called at trial and provide all information specified in CLP 7.5, together with such other and further relief as the Court may deem just and appropriate under the circumstances.

Dated: January 31, 2014

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Electronic Mail upon counsel identified below registered to receive electronic notifications and regular U.S. mail upon *Pro Se* parties this 31st day of January, 2014, upon the following:

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