

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

**Case No: 12-034123(07)
Complex Litigation Unit**

P&S ASSOCIATES, GENERAL PARTNERSHIP,
et. al.,
Plaintiffs,

vs.
MICHAEL D. SULLIVAN,
et al.,
Defendants.

**PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
DEFENDANT MICHAEL BIENES'S THIRD SET OF INTERROGATORIES**

Plaintiffs, by and through their undersigned counsel, hereby move for an extension of time to respond to Defendant Michael Bienes's ("Bienes") Third Set of Interrogatories to Plaintiffs, and in support thereof state:

1. On January 21, 2016, Bienes served Defendant Michael Bienes's Third Set of Interrogatories to Plaintiffs.
2. Plaintiffs' response to Bienes's Third Set of Interrogatories is currently due on February 29, 2016.
3. Because lead counsel for Plaintiffs is currently in trial, Plaintiffs respectfully request an extension of time up to and until March 4, 2016, to complete their responses to Bienes's Third Set of Interrogatories.
4. Plaintiffs contacted counsel for Defendant Bienes to obtain consent for this requested extension of time, but Bienes's counsel has not responded to Plaintiffs.

5. No party would suffer prejudice if the Court grants the brief extension sought.

WHEREFORE Plaintiffs request this Court enter an order (i) granting Plaintiffs' an extension of time, up to and until March 4, 2016, to respond to Defendant Michael Bienes's Third Set of Interrogatories and (ii) for such other and further relief as this Court deems just and proper.

February 29, 2016

Respectfully submitted,

By: *s/ Leonard K. Samuels*

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on February 29, 2016, a copy of the foregoing was filed with the Clerk of the Court via the E-filing Portal, and served via Electronic Mail by the E-filing Portal upon:

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