

**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.  
STEVEN F. JACOB,  
*et al.*,  
Defendants.

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**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") Fourth Set of Interrogatories, Fourth Request for Production, and Expert Interrogatories (the "Discovery") to Plaintiffs, and in support thereof state:

1. On February 26, 2016, Bienes served Defendant Michael Bienes's Fourth Set of Interrogatories, Fourth Request for Production, and Expert Interrogatories to Plaintiffs (the "Discovery").
2. Plaintiffs' response to Bienes's Discovery is currently due on April 4, 2016.
3. Plaintiffs request a brief extension of time up to and until April 8, 2016, to complete their responses to Bienes's Discovery.
4. Plaintiffs contacted counsel for Defendant Bienes to obtain consent for this requested extension of time. Presently, Plaintiffs have not received a response to their request.
5. No party would be prejudiced by the relief sought through this Motion.

WHEREFORE Plaintiffs request this Court enter an order (i) extending Plaintiffs' deadline to respond to the Discovery through and including, April 8, 2016; and (ii) granting such other and further relief as this Court deems just and proper.

Dated: April 4, 2016

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on April 4, 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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