

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

CASE NO.: 12-028324 CACE (07)
Complex Litigation Unit

P & S ASSOCIATES, GENERAL
PARTNERSHIP and S & P ASSOCIATES,
GENERAL PARTNERSHIP,

Plaintiff,

vs.

LYNN ROSE,

Defendant(s).

**DEFENDANT, LYNN ROSE'S MOTION FOR ENLARGEMENT OF TIME TO FILE
RESPONSE TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

Defendant, LYNN ROSE aka LYNN ROSEN-LAUDER, pursuant to Florida Rules for Civil Procedure 1.090, and all other applicable law files this her Motion for Enlargement of Time to Response to Plaintiff's Second Amended Complaint and states:

1. Defendant, Lynn Rose was served with a summons and seconded amended complaint in this action on or about May 27, 2013.
2. The undersigned was recently retained to represent Defendant in regard to this matter.
3. The undersigned is in need of an additional twenty (20) days to file an appropriate response to Plaintiff's Second Amended Complaint.
4. The undersigned is in the process of contacting Plaintiff's counsel regarding this motion and is awaiting a response to Plaintiff's position.
5. This motion is filed in good faith and not for the purpose of delay.

WHEREFORE, Defendant, Lynn Rose, respectfully requests this Court enter an order granting her motion for enlargement of time to file a responsive pleading to the Plaintiff's

Complaint up until and through July 8, 2013, and other such further relief this court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via E-mail and U.S. Mail to: Thomas M. Messana, Esq., tmessana@messana-law.com, Attorneys for Plaintiff, Philip J. Von Kahle, the Conservator, MESSANA, P.A., 401 East Las Olas Boulevard, #1400, Fort Lauderdale, FL 33301, on this 7th day of June, 2013.

Respectfully submitted,
GAMBERG & ABRAMS
Attorneys for Defendant, Lynn Rosen-Lauder
1776 North Pine Island Road, Suite 309
Fort Lauderdale, Florida 33322
Telephone: (954) 523-0900
Facsimile: (954) 915-9016
E-mail: tabrams@tabramslaw.com

By: 

Thomas L. Abrams, Esq.
Florida Bar No. 764329