

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

CASE NO.: 12-034123 (07)

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

Plaintiffs,

v.

MICHAEL D. SULLIVAN, et al.,

Defendants.

**DEFENDANTS FRANK AVELLINO AND MICHAEL BIENES' JOINT
MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S THIRD
AMENDED COMPLAINT**

Defendants, Frank Avellino and Michael Bienes, by and through their undersigned counsel, move this court for an order extending their time to respond to Plaintiff's Third Amended Complaint ("TAC") and as grounds therefor state:

1. On June 27, 2014, Plaintiffs filed the TAC, which asserts new and substantial factual allegations and claims for relief. Defendants' responses are due July 7, 2014.
2. Counsel for Defendants require additional time to prepare their responses to the TAC up to and including July 25, 2014. Due to the workload of the undersigned attorneys and the intervening holiday, the additional time is required to complete their responses.
3. This request is made in good faith and not for the purpose of delay. Plaintiff will not be prejudiced by the short extension.

WHEREFORE, Defendants request that this court enter an order extending their time to respond to Plaintiff's Third Amended Complaint up to and including July 25, 2014.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of July 2014, the foregoing document is being served on those on the attached service list by electronic service via the Florida Court E-Filing Portal in compliance with Fla. Admin Order No. 13-49.

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