

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.

**DEFENDANT FRANK AVELLINO'S MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF'S MOTION TO STRIKE
DEFENDANT'S AFFIRMATIVE DEFENSES**

Defendant, FRANK AVELLINO, by and through his undersigned counsel, moves this court for an extension of time to respond to Plaintiff's Motion to Strike Defendant's Affirmative Defenses, and as grounds therefor states:

1. Counsel for Defendant requires additional time to prepare his response to Plaintiff's Motion to Strike Defendant's Affirmative Defenses up to and including July 20, 2015. The response is currently due on July 13, 2015, which is the first day the undersigned attorney will return to the office after being out of the country. The additional time is required to complete the response.

2. This request is made in good faith and not for the purpose of delay. Plaintiff will not be prejudiced by the short extension.

WHEREFORE, Defendant requests that this court enter an order extending his time to respond to Plaintiff's Motion to Strike Defendant's Affirmative Defenses up to and including July 20, 2015.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of July, 2015, 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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