

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

CASE NO.: 12-34121 CACE (07)
Complex Litigation Unit

MARGARET SMITH, et al.,

Plaintiff(s),

vs.

JANET A. HOOKER CHARITABLE TRUST, et al.,

Defendant(s).

**DEFENDANTS, SAM ROSEN AND EDITH ROSEN, MOTION FOR ENLARGEMENT
OF TIME TO FILE RESPONSE TO PLAINTIFFS' COMPLAINT**

Defendants, SAM ROSEN and EDITH ROSEN, pursuant to Florida Rules for Civil Procedure 1.090, and all other applicable law files this their Motion for Enlargement of Time to Response to Plaintiffs' Complaint and states:

1. Defendants, SAM ROSEN and EDITH ROSEN, were served with an alias summons and complaint in this action on or about July 24, 2013.
2. The undersigned was recently retained to represent Defendants in regard to this matter.
3. The undersigned is in need of an additional twenty (20) days to file an appropriate response to Plaintiffs' Complaint.
4. The undersigned is in the process of contacting Plaintiffs' 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.

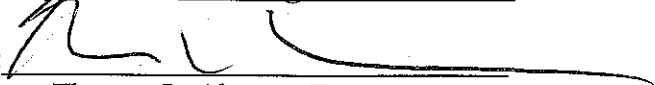
WHEREFORE, Defendants, SAM ROSEN and EDITH ROSEN, respectfully requests this Court enter an order granting their motion for enlargement of time to file a responsive

pleading to the Plaintiffs' Complaint up until and through September 4, 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 Philip J. Von Kahle, the Conservator of the P & S Associates, General Partnership and the S & P Associates, General Partnership ("Plaintiff's Attorney"), MESSANA, P.A., 401 East Las Olas Boulevard, #1400, Fort Lauderdale, FL 33301, on this 13th day of August, 2013.

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

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