

**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 JACOB, et al.,  
*et al.*,  
Defendants.

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**JOINT MOTION FOR EXTENSION OF TIME  
TO FILE JOINT PRETRIAL STIPULATION**

Plaintiffs P & S Associates, General Partnership (“P&S”), S & P Associates, General Partnership (“S&P”) and Philip Von Kahle as Conservator on behalf of P&S and S&P, and Defendants Frank Avellino and Michael Bienes (collectively, the “Parties”), by and through their respective counsel, hereby move for an Order granting an extension of time to file the Joint Pretrial Stipulation, and in support thereof state:

1. On June 7, 2016, the Court entered an Order Setting Pre-Trial Instructions and Calendar Call, providing for a deadline to file a Joint Pretrial Stipulation in this matter by August 31, 2016.
2. On August 23, 2016, the Court held a specially-set hearing on numerous matters, one of which was Defendant’s Amended Motion for Summary Judgment (“Defendants’ Motion”).
3. Upon the conclusion of the August 23<sup>rd</sup> specially-set hearing, the Court determined it would reserve ruling on Defendants’ Motion.

4. The Parties believe it is in the best interest of all the parties herein, to await the ruling upon Defendants' Motion to allow for a more efficient preparation of the Joint Pretrial Stipulation and therefore, request the entry of the attached agreed order granting an additional fifteen days from the entry of the Court's Ruling on Defendants' Amended Motion for Summary Judgment within which to submit the Joint Pretrial Stipulation, along with extending the other deadlines contained in the Pretrial Order.

5. No party would be prejudiced if the Court grants the relief sought herein.

WHEREFORE, the Parties respectfully request this Court enter an order granting an additional fifteen (15) from the entry of the Court's Ruling order on Defendant's Amended Motion for Summary Judgment, within which to file the Joint Pretrial Stipulation and to extend the other deadlines contained in the Pretrial Order, and such other and additional relief that the Court deems just and proper.

Respectfully submitted,

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August 31, 2016

August 31, 2016

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on August 31st, 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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