

**IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT, IN
AND FOR BROWARD COUNTY, FLORIDA**

CASE NO.: 12-034121 (07)

P&S ASSOCIATES, General Partnership, *et al.*,
Plaintiffs,

v.

JANET A. HOOKER CHARITABLE TRUST, a
charitable trust, *et al.*,

Defendants.

**PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
DEFENDANTS JAMES AND VALERIE JUDD'S OUTSTANDING DISCOVERY**

Plaintiffs, P & S Associates, General Partnership (“P&S”), and S & P Associates, General Partnership (“S&P”), (collectively the “Partnerships”) and Philip Von Kahle as Conservator on behalf of the Partnerships (the “Conservator” and collectively with the Partnerships, “Plaintiffs”), by and through their undersigned attorneys, file this Motion for an Extension of Time to Respond to James and Valerie Judd’s (collectively, “Defendants Judd”) Second Request for Admissions, Second Set of Interrogatories and Third Set of Interrogatories and in support thereof state:

1. Pursuant to this Court’s Bench Ruling on August 18, 2014, Plaintiffs were obligated to file responses and objections to Defendants Judd’s Second Request for Admissions, Second Set of Interrogatories, and Third Set of Interrogatories (the “Requests”), on or before September 2, 2014.

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1.

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2. On August 29, 2014, Defendants Judd participated in mediation.
3. In order to avoid the unnecessary expenditure of attorney's fees and to allow additional time for the parties to explore settlement, Plaintiffs request a brief extension of time to respond to the Requests up to and until September 4, 2014.
4. No party will be prejudiced by the relief sought.
5. Plaintiffs sought Defendants' consent to an extension of time to respond to the Requests, but did not receive a response.

WHEREFORE the Plaintiffs request that this Court enter an order extending the deadline for Plaintiffs to respond to the Requests up to and until September 4, 2014.

Dated: September 2, 2014

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Electronic Mail upon counsel identified below registered to receive electronic notifications and regular U.S. mail upon *Pro Se* parties this 2nd day of September, 2014, upon the following:

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