

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup>  
JUDICIAL CIRCUIT, IN AND FOR  
BROWARD COUNTY, FLORIDA

P&S ASSOCIATES GENERAL  
PARTNERSHIP and S&P ASSOCIATES  
GENERAL PARTNERSHIP,

CASE NO. 12-028324 (07)  
Complex Business Litigation Unit

Plaintiff,

v.

ROBERTA P. ALVES, ET AL.

Defendants.

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**DEFENDANT JENNIFER J. WEBER'S**  
**MOTION FOR EXTENSION OF TIME TO RESPOND TO AMENDED COMPLAINT**

COME NOW, Defendant, JENNIFER J. WEBBER, an individual, by and through her undersigned counsel, and hereby move this Court for an extension of time to respond to the Third Amended Complaint, and in support thereof, state as follows:

1. Plaintiff filed an Amended Complaint on or about July 29, 2013. Ms. Weber was served on August 5, 2013 at her home in Denver, North Carolina. A response to the Third Amended Complaint is due on or about September 6, 2013.

2. By way of this Motion, Defendants seek an enlargement of time of up to and including October 5, 2013, to serve her response to the Third Amended Complaint.

3. This enlargement of time is supported by good cause due to counsel for said Defendants unusually heavy caseload. Moreover, due to the nature of the allegations contained in the Third Amended Complaint, Defendants require additional time to confer with counsel so that a response can be prepared.

3. This Motion is being brought in good faith and is not interposed for the purpose

of delay.

4. Defendant, Weber, by requesting this extension of time, does not waive her right to challenge jurisdiction or otherwise seek dismissal of the Third Amended Complaint.

5. Accordingly, for the good cause set forth above, JENNIFER J. WEBBER, seeks an enlargement of time, up through and including October 5, 2013, within which to serve her response to the Third Amended Complaint.

WHEREFORE, Defendant, JENNIFER J. WEBBER, respectfully requests that this Court enter an Order enlarging the deadline for them her serve her response to the Third Amended Complaint in this matter through and including October 5, 2013, together with such other and further relief as this Court deems just and proper.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email [tmessana@messan-law.com] and U.S. Mail to: Thomas M. Messana and Brett D. Lieberman, Attorneys for Conservator, Post Office Drawer 2485, Fort Lauderdale, FL 33303, on this 6th day of September 2013.

SACHS SAX CAPLAN, P.L.  
Attorneys for Defendant  
6111 Broken Sound Parkway, NW, Suite 200  
(561) 994-4499; (561) 994-4985 Facsimile

*/s/ Aram C. Bloom*

By: \_\_\_\_\_  
Aram C. Bloom  
Florida Bar No. 72465