

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

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

P&S ASSOCIATES, GENERAL
PARTNERSHIP, 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' AMENDED 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' Amended Complaint and states:

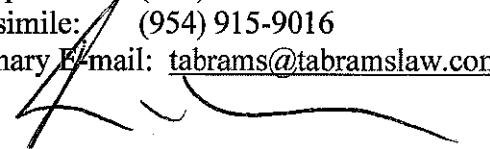
1. Defendants, SAM ROSEN and EDITH ROSEN, were served with an alias summons and amended in this action on or about July 24, 2013.
2. On October 29, 2013, Plaintiff's filed its Motion for Leave to File An Amended Complaint.
3. On November 4, 2013, this Court granted the Plaintiff's Motion for Leave to File an Amended Complaint.
4. The undersigned is in need of an additional twenty (20) days to file an appropriate response to Plaintiffs' Amended Complaint.
5. The undersigned is in the process of contacting Plaintiffs' counsel regarding this motion and is awaiting a response to Plaintiff's position.
6. 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' Amended Complaint up until and through December 14, 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 upon counsel registered to received electronic notification* and via E-mail and U.S. Mail as noted on the attached service list 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; Leonard K. Samuels, Esq., Ethan Mark, Esq., Steven D. Weber, Esq., Zachary P. Hyman, Esq., lsamuels@bergersingerman.com, emark@bergersingerman.com, sweber@bergersingerman.com, drt@bergersingerman.com, Vleon@bergersingerman.com, lwebster@bergersingerman.com, zhyman@bergersingerman.com, Berger Singerman, 350 East Las Olas Boulevard, Suite 1000, Fort Lauderdale, Florida: 33301; on this 25 day of March, 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

SERVICE LIST
MARGARET J. SMITH, ET AL. VS. JANET A. HOOKER CHARITABLE TRUST, ET AL.
CASE NO.: 12-034121 (07) ("Net Winner Suit")Complex Litigation Unit

Furnished via E-Mail and U.S. Mail to:

Thomas M. Messana, Esq.,
Brett Lieberman, Esq.
Messana, P.A.
401 East Las Olas Boulevard, #1400
Fort Lauderdale, FL 33301
tmessana@messana-law.com
blieberman@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")*

Leonard K. Samuels, Esq.
Ethan Mark, Esq.
Steven D. Weber, Esq.
Zachary P. Hyman, Esq.
Berger Singerman
350 East Las Olas Boulevard, Suite 1000
Fort Lauderdale, Florida: 33301
lsamuels@bergersingerman.com;
emark@bergersingerman.com;
sweber@bergersingerman.com;
drt@bergersingerman.com;
Vleon@bergersingerman.com;
lwebster@bergersingerman.com;
zhyman@bergersingerman.com;
(Attorneys for Plaintiffs)

Furnished Via E-mail only to:

Eric N. Assouline, Esq.
Assouline & Berlowe, P.A.
213 E. Sheridan Street, Suite 3
Dania Beach, Florida 33004
ena@assoulineberlowe.com;
ah@assoulineberlowe.com;
(Attorneys for Ersica P. Gianna)

Julian H. Kreeger, Esq.
2665 S. Bayshore Drive, Suite 220-14
Miami, Florida 33133-5402
Juliankreeger@gmail.com;
(Attorneys for James Bruce Judd and Valeria Judd)

Joseph P. Klapholz, P.A.
jklap@klapholzpa.com,
dml@klapholzpa.com,
2500 Hollywood Boulevard, Suite 212
Hollywood, Florida 33020
(Attorneys for Defendants Abraham & Rita Newman, Gertrude Gordon)

Daniel W. Matlow, Esq.
3109 Stirling Road, Suite 101
Fort Lauderdale, FL 33312
dmatlow@danmatlow.com,
assistant@danmatlow.com,
(Attorneys for Irwig Revocable Trust)

Michael R. Casey, Esq.
1831 NE 38th Street, #707
Oakland Park, FL 33308
mcasey666@gmail.com

*(Attorneys for Susan E. Molchan or Thomas A. Whiteman, Janet B. Molchan Trust DTD 5/19/94
and Alex E. Molchan Trust DTD 05/19/94)*

Marc S. Dobin, Esq.
Jonathan Thomas Lieber, Esq.
Dobin Law Group, P.A.
500 University Blvd. #205
Jupiter, Florida 33458-2775
mdobin@dobinlaw.com
jlieber@dobinlaw.com
service@dobinlaw.com

(Attorneys for Congregation of the Holy Ghost Western Province, Inc.)

Peter G. Herman, Esq.
Tripp Scott
110 SE Sixth Street, Suite 1500
Fort Lauderdale, FL 33301
PGH@trippscott.com

Michael C. Foster, Esq.
Annette M. Urena, Esq.
Daniels Kashtan
4000 Ponce de Leon Blvd., Suite 800
Coral Gables, FL 33146
Mfoster@dkdr.com
aurena@dkdr.com

Richard T. Woulfe, Esq.
Bunnell & Woulfe P.A.
One Financial Plaza, Suite 1000
100 SE Third Avenue
Fort Lauderdale, FL 33394
Pleadings.RTW@bunnellwoulfe.com

Joanne Wilcomes, Esq.
McCarter & English, LLP
100 Mulberry Street
Four Gateway Center
Newark, NJ 07102
jwilcomes@mccarter.com
tgoodwin@mccarter.com

Robert J. Hunt, Esq.
Debra D. Klingsberg, Esq.
boh hunt@huntgross.com
dklingsberg@huntgross.com

Evan H. Frederick, Esq.
Ryon M. McCabe, Esq.
efrederick@mccaberabin.com
rmccabe@mccaberabin.com

By: /s/Thomas L. Abrams
THOMAS L. ABRAMS, ESQUIRE