

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

**Case No: 12-034121(04)
Complex Litigation Unit**

P&S ASSOCIATES, GENERAL PARTNERSHIP,
et. al.,
Plaintiffs,

vs.
JANET A. HOOKER CHARITABLE TRUST,
et al.,
Defendants.

**PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME TO FILE A RESPONSE TO
DEFENDANT ROBERT A. UCHIN REVOCABLE TRUST'S MOTION FOR
SUMMARY JUDGMENT AND INCORPORATED MEMORANDUM OF LAW**

Plaintiffs, by and through their undersigned counsel, hereby move for an extension of time to file a response to Defendant Robert A. Uchin Revocable Trust's ("Defendant") Motion for Summary Judgment, and in support thereof state:

1. On October 25, 2013, Defendant filed a Motion for Summary Judgment (the "Motion").
2. On October 29, 2013, Plaintiffs filed a Motion for Leave to File an Amended Complaint, which was subsequently granted by the Court.
3. On December 6, 2013, during the monthly Status Conference for this action, the parties agreed that all motions for summary judgment that raise the defense of statute of limitations will be heard at a single hearing. That hearing is to be in April 2014.

4. Plaintiffs' response to the Motion is currently due on December 9, 2013.

5. Subsequent to the December 6 Status Conference, the Parties are now developing a new proposed Case Management Order for this action, to be submitted to the Court.

6. Plaintiffs believe that their responses to all motions for summary judgment should be due on a uniform date prior to the April 2014 hearing, and with time for Defendant and other parties to submit a reply memorandum, if any. A uniform date for responses will not prejudice Defendant or any other party because all motions for summary judgment will be heard on the same date, and an earlier response will not cause an earlier hearing.

7. Therefore, to conserve efforts in preparing responses and to allow the parties to conduct discovery in this action, Plaintiffs request an extension of time to respond to Defendant's Motion until either: (1) the deadline to respond to motions for summary judgment as provided by the Case Management Order to be entered by the Court; or (2) seven days after the Court rules on this Motion, whichever is later.

8. Plaintiffs attempted to confer with Defendant regarding their request for an extension of time but were unable to obtain a response to their request.

9. This request is made in good faith and not for the purpose of delay. Defendant will not be prejudiced by this request for an extension of time.

Respectfully submitted,

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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 9th day of December, 2013 upon the following:

Notice has been electronically mailed to:

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