

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 07-80603-CIV-HURLEY/HOPKINS

TARA LOCASTRO, on her own behalf
and all others similarly situated,

Plaintiff,

v.

LYDIAN TRUST COMPANY,
a Florida corporation,

Defendant.

DEFENDANT'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

The defendant, Lydian Trust Company ("Lydian"), moves for two-week enlargement of time within which to serve its responses to Plaintiff's Requests for Admissions, Interrogatories and Request for Production, and in support states as follows:

1. Locastro served discovery requests on Lydian, including Requests for Admissions, Interrogatories and a Request for Production on August 30, 2007. Lydian's responses are currently due October 2, 2007.
2. Due to the press of other matters, Lydian requires a brief enlargement of time to respond to Plaintiff's discovery requests.
3. This enlargement is sought in good faith and not for dilatory or improper purposes.
4. Counsel for Lydian has conferred with Plaintiff's counsel, regarding the subject matter of this motion. Plaintiff's counsel has advised Counsel for Lydian that he has no objection to providing Lydian with the requested two-week enlargement.

5. Lydian's request for an enlargement of time should be granted pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, which provides in part: "[w]hen by these rules . . . an act is required or allowed to be done at or within a specified time, the court for cause shown may at any time in its discretion . . . order the period enlarged if request therefore is made before the expiration of the period originally prescribed . . ." FED.R.CIV.P. 6(b).

6. For the foregoing reasons, Lydian respectfully requests the entry of an Order granting it a two-week enlargement of time within which to serve its responses to Plaintiff's discovery requests.

Date: October 2, 2007

Respectfully submitted,

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **DEFENDANT'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME** was served by CM/ECF and by depositing same in the United States Mail, First Class, postage prepaid on **October 2, 2007** on all counsel or parties of record on the attached service list.

/s/ David A. Buchsbaum

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