

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 10-CV-22236-ASG/GOODMAN

HOWARD ADELMAN AND JUDITH SCLAWY
as Co-Personal Representatives of the
ESTATE OF MICHAEL SCLAWY-ADELMAN,

Plaintiffs,

v.

BOY SCOUTS OF AMERICA;
THE SOUTH FLORIDA COUNCIL INC.,
BOY SCOUTS OF AMERICA; PLANTATION
UNITED METHODIST CHURCH; HOWARD
K. CROMPTON, Individually, and
ANDREW L. SCHMIDT, Individually,

Defendants.

**AGREED MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFFS' REPLY TO
SCHMIDT'S SECOND RESPONSE TO PLAINTIFFS' MOTION TO COMPEL EMAILS**

COME NOW, the Plaintiffs, HOWARD ADELMAN AND JUDITH SCLAWY as Co-Personal Representatives of the ESTATE OF MICHAEL SCLAWY-ADELMAN, by and through their undersigned attorneys and move this Honorable Court for the entry of an extension of time in which to file their Reply to the Defendant Schmidt's Second Response to the Plaintiffs' Motion to Compel Emails and would respectfully show the Court as follows:

1. On July 14, 2011, this Honorable Court conducted a hearing on the Plaintiffs' Motion to Compel Production of Emails identified in the Defendant Schmidt's Privilege Log and provided the Defendant Schmidt with an opportunity to file a second response to the Plaintiffs' Motion.
2. Although the Court initially provided the Defendant with one week in which to file

its second response, the Defendant thereafter moved for an extension of time, which was granted by the Court without objection by the Plaintiffs. As a result, the time for the filing of the Defendant's Second Response was extended to Friday, July 29.

3. The Defendant filed its second response on July 29, 2011 after the close of normal business hours and accordingly, the Plaintiff did not receive a copy of the pleading until the following Monday, August 1. During the ensuing five days in which the Plaintiffs has had to prepare its Reply, two have been (or will be) taken up by depositions in this case.

4. In light of the length of the Defendant's Second Response (26 pages) and the fact that undersigned counsel's secretary will be on vacation during a portion of this time, the Plaintiffs request that this Honorable Court grant an additional week, until August 12, 2011, in which to file their Reply.

5. Undersigned counsel has conferred with counsel for the Defendant who has graciously agreed to the request for an extension.

WHEREFORE, the Plaintiffs move this Honorable Court for the entry of an order extending the time for the Plaintiffs' Reply to the Defendants Schmidt's Second Response to Plaintiffs' Motion to Compel Production of Emails until Friday, August 12, 2011.

Dated: August 3, 2011.

Respectfully submitted,

/s/ Robert D. Peltz

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on **August 3, 2011**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Robert D. Peltz

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