

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No. 1:10-cv-23235/HOEVELER

DAVID KARDONICK, JOHN DAVID, and
MICHAEL CLEMINS, individually and on
behalf of all others similarly situated and the
general public,

Plaintiffs,

v.

JPMORGAN CHASE & CO. and CHASE
BANK USA, N.A.

Defendants.

**CHASE'S MOTION FOR EXTENSION OF TIME TO FILE
A REPLY MEMORANDUM**

Robert D. Wick
Andrew Soukup
COVINGTON & BURLING LLP
Attorneys for Defendants
1201 Pennsylvania Ave. N.W.
Washington, D.C. 20004
Telephone: (202) 662-6000
Facsimile: (202) 778-5487

Dennis M. Campbell
CAMPBELL LAW FIRM PLLC
Attorney for Defendants
95 Merrick Way
Suite 514
Coral Gables, Florida 33134
Telephone: (305) 444-6040
Facsimile: (305) 444-6041

Defendant Chase Bank USA, N.A. (“Chase”), by and through their undersigned counsel, hereby moves this Court for a one (1) day extension to file its reply memorandum. In support of this motion, Chase states as follows:

1. On October 17, 2012, the Court granted Chase’s motion for an extension of time to file a reply memorandum and motion to exceed the page limit. The Court’s order requires Chase to file and serve a single consolidated reply memorandum of up to eighteen pages on or before October 25, 2012. [DE 460].

2. Chase respectfully moves this Court for an additional one-day extension of time that would permit it to file its reply memorandum on or before October 26, 2012. Chase seeks this additional extension because of an unexpected matter that required intensive attention from Chase’s counsel. A one-day extension will also permit Chase to file a shorter and more succinct reply brief.

3. This motion is made in the interest of justice, not to delay the proceedings, and will not prejudice any party.

WHEREFORE, Chase respectfully moves this Court to grant leave for Chase to file a reply memorandum on or before October 26, 2012. A proposed order granting this motion is attached hereto.

CERTIFICATION

Pursuant to S.D. Fla. L.R. 7.1(a)(3), the undersigned certifies that counsel for Chase has made reasonable efforts to confer with all parties or non-parties who may be affected by the relief sought in this motion, by e-mail sent on the morning of October 24, 2012, but has been unable to do so.

Dated: October 24, 2012

Respectfully submitted,

Robert D. Wick (admitted *pro hac vice*)
Andrew Soukup (admitted *pro hac vice*)
COVINGTON & BURLING LLP
Attorneys for Defendants
1201 Pennsylvania Ave. N.W.
Washington, D.C. 20004
Telephone: (202) 662-6000
Facsimile: (202) 778-5487
E-mail: rwick@cov.com
E-mail: asoukup@cov.com

Dennis M. Campbell
CAMPBELL LAW FIRM, PLLC
Attorney for Defendants
95 Merrick Way, Suite 514
Coral Gables, Florida 33134
Telephone: (305) 444-6040
Facsimile: (305) 444-6041
E-mail: dcampbell@campbelllawfirm.net

s/Dennis M. Campbell

Dennis M. Campbell
Florida Bar No. 271527

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of October, 2012, I electronically filed Chase's Motion for Extension of Time to File a Reply Brief using the ECF system, which will send a notification of such filing to the counsel of record who have entered appearances in this action. In addition, I served a true and correct copy of Chase's Motion for Extension of Time to File a Reply Memorandum via e-mail on the following individuals:

Richard M. Golomb, Esq.
Kenneth J. Grunfeld, Esq.
GOLOMB & HONIK, P.C.
1515 Market Street, Suite 1100
Philadelphia, PA 19102
E-mail: rgolomb@golombhonik.com
E-mail: kgrunfeld@golombhonik.com

Laura Baughman, Esq.
Thomas M. Sims, Esq.
BARON & BUDD, P.C.
3102 Oak Lawn Ave., Suite 1100
Dallas, TX 75219
E-mail: lbaughman@baronbudd.com
E-mail: tsims@baronbudd.com

J. Burton LeBlanc, IV, Esq.
BARON & BUDD, P.C.
9015 Bluebonnet Boulevard
Baton Rouge, LA 70810
E-mail: bleblanc@baronbudd.com

s/Dennis M. Campbell
Dennis M. Campbell