

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO.: 1:13-cv-22589-KMW

MIGUEL ANGEL CORBACHO  
DAUDINOT

Plaintiff,

v.

YASIEL PUIG VALDES a/k/a  
YASIEL PUIG and MARITZA  
VALDES GONZALEZ,

Defendants.

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**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS**

Defendants, Yasiel Puig Valdes a/k/a Yasiel Puig and Maritza Valdes Gonzalez, pursuant to Fed. R. Civ. P. 6(b)(1)(A), hereby move for a 7-day extension of time – up to and including October 31, 2013 -- in which to file their reply memorandum in support of their motion to dismiss the first amended complaint [DE 11]. The grounds for this motion are:

1. On October 14, 2013, plaintiff filed his memorandum in opposition to defendants' motion to dismiss. [DE 12.] Pursuant to S.D. Fla. L.R. 7.1, defendants' reply memorandum in support of their motion to dismiss is currently due on October 24, 2013.

2. Due to the press of other work, including preparing for an evidentiary hearing earlier this week in Miami-Dade County Circuit Court and preparing for a

hearing this Friday in U.S. Bankruptcy Court, undersigned counsel is unable to prepare defendants' reply memorandum by tomorrow, October 24. For that reason, defendants request a 7-day extension of time – up to and including October 31, 2013 -- in which to file their reply memorandum.

3. The extension of time sought herein will not unduly delay these proceedings or prejudice any of the parties.

For the foregoing reasons defendants request a 7-day extension of time, up to and including October 31, 2013, in which to file their reply memorandum in support of their motion to dismiss plaintiff's first amended complaint.

**Local Rule 7.1(a)(3) Certification**

Undersigned counsel has conferred in writing with lead counsel for plaintiff, Kenia Bravo, regarding this motion and certifies that Ms. Bravo has no objection to the 7-day extension of time sought herein.

Respectfully submitted,

**SANTINI LAW**  
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By: /s/ Sean R. Santini  
Sean R. Santini  
Florida Bar No. 832898

**CERTIFICATE OF SERVICE**

I hereby certify that on October 23, 2013, 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 or pro se parties 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.

By: /s/ Sean R. Santini  
Sean R. Santini

## SERVICE LIST

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