

UNITED STATES DISTRICT COURT
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.

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
DEFENDANTS' RESPONSE TO THE SECOND AMENDED COMPLAINT**

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 an extension of time – up to and including February 10, 2014 -- in which to file their response to the second amended complaint [DE 24]. The grounds for this motion are:

1. Pursuant to the Court's order of December 20, 2013 (DE 23), plaintiffs filed their second amended complaint in this matter on January 13, 2014. Pursuant to Fed. R. Civ. P. 15(a)(3), defendants' response is due on January 23, 2014.

2. Due to the press of other matters, including the preparation of a brief to the Eleventh Circuit and hearings on a motion to dismiss and several discovery disputes in a separate state court matter, undersigned counsel is unable to submit defendants'

response to the second amended complaint by the current deadline and, therefore, requests an 18-day extension of time in which to do so.

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 an extension of time, up to and including February 10, 2014, in which to file their response to the second amended complaint.

Local Rule 7.1(a)(3) Certification

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

Respectfully submitted,

SANTINI LAW

1001 Brickell Bay Drive, Suite 2650

Miami, Florida 33131

Tel: (305) 372-7307

Fax: (305) 372-7308

ssantini@santinilawfirm.com

By: /s/ Sean R. Santini

Sean R. Santini

Florida Bar No. 832898

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2014, 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

Kenia Bravo, Esq.

avelinogonzalez2@bellsouth.net

Law Offices of Avelino J. Gonzalez, P.A.

6780 Coral Way

Miami, FL 33155

Avelino Jose Gonzalez, Esq.

avelinogonzalez@bellsouth.net

Law Offices of Avelino J. Gonzalez, P.A.

6780 Coral Way

Miami, FL 33155