

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.
_____ /

DEFENDANT'S MOTION FOR CONTINUANCE OF ORAL ARGUMENT

Defendants, Yasiel Puig Valdes a/k/a Yasiel Puig and Maritza Valdes Gonzalez, pursuant to S.D. Fla. L.R. 7.6, move for a continuance of the oral argument on Defendants' Motion to Dismiss Second Amended Complaint (ECF No. 28), currently set for May 16, 2014. The grounds for this motion are set forth in the declaration of undersigned counsel attached hereto as Exhibit A.

1. Attached as Exhibit A is the declaration of undersigned counsel explaining the scheduling conflict that requires the filing of this motion. See S.D. Fla. L.R. 7.6.

2. Undersigned counsel contacted plaintiff's counsel regarding this motion and was advised that plaintiffs take "no position" regarding the relief requested herein.

For the foregoing reasons, Defendants move for a continuance of the May 16, 2014 Oral Argument on Defendants' Motion to Dismiss Second Amended Complaint (ECF No. 28) to a date after June 6, 2014.

Respectfully submitted,

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By: /s/ Sean R. Santini

Sean R. Santini

Florida Bar No. 832898

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 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 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/ Sean R. Santini
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DECLARATION OF SEAN SANTINI

My name is Sean Santini. I am Defendants' counsel of record in this matter. I submit this declaration in support of Defendants' Motion for Continuance of Oral Argument.

1. On May 11, 2014 the Court entered an order setting oral argument on Defendants' Motion to Dismiss the Second Amended Complaint for May 16, 2014. [ECF No. 34.]

2. I must attend a Court-ordered mediation on May 16 in a case pending before Judge Seitz (Case No. Case No: 1:12-cv-23466-Seitz) in

Exhibit A

which I am also counsel of record. I am, therefore, unavailable to attend the oral argument scheduled in this action for that same date.

3. Beginning on Monday, May 19, 2014, I will begin a specially-set three week trial in Miami-Dade County Circuit Court (*Shay v. Brown, et al.*, Case No. 12-21479 CA 09) wherein I am counsel of record for plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 12, 2014.

/s/ Sean R. Santini

Sean R. Santini

Florida Bar No. 832898