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,

٧.

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

Defendants.

/

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO 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 a 10-day extension of time in which to submit their response to the complaint. The grounds for this motion are:

- 1. Defendants' response to complaint is currently due on August 12, 2013.
- 2. Undersigned counsel has been out of the country and, due to the press of other work upon his return, is unable to prepare defendants' response to the complaint by August 12. For that reason, defendants request a 10-day extension of time in which to submit their response.
- 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 10-day extension of time, up to and including August 22, 2013, in which to submit their response to the 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 10-day extension of time sought herein.

Respectfully submitted,

SANTINI LAW

1200 Brickell Avenue, Suite 950 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 August 8, 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.

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