

**Exhibit C**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.  

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**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO ANSWER 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 August 1, 2014, in which to file their answer and affirmative defenses to the second amended complaint [ECF No. 24]. The grounds for this motion are:

1. On June 25, 2014, the Court entered an order denying defendants' motion to dismiss the second amended complaint [ECF No. 40]. Pursuant to Fed. R. Civ. P. 12(a)(4)(A) and 6(d), defendants' answer to the second amended complaint is due by July 11, 2014.

2. Undersigned counsel is in depositions this week in another matter pending before the District Court for the Southern District of Florida and is scheduled to be out of

the country on vacation from July 16<sup>th</sup> to the 25<sup>th</sup>. For that reason, defendants request a 21-day extension of time in which to file and serve their answer and affirmative defenses to the second amended complaint.

3. The extension of time sought herein will not unduly delay these proceedings, jeopardize any of the Court's deadlines or prejudice any of the parties.

For the foregoing reasons defendants request an extension of time, up to and including August 1, 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, Avelino J. Gonzalez, regarding this motion and certifies that Mr. Gonzalez has no objection to the extension of time sought herein.

Respectfully submitted,

**SANTINI LAW**

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By: /s/ Sean R. Santini

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Sean R. Santini

Florida Bar No. 832898

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 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**

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