

Exhibit EUNITED 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' SECOND 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 a one-week extension of time, up to and including August 8, 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' deadline to file the answer to the second amended complaint was July 11, 2014.

2. On July 8, 2014, defendants filed a motion for extension of time to answer the second amended complaint. [ECF No. 43.] On July 8, 2014, the Court granted the motion and extended defendants' deadline to answer to August 1, 2014. [ECF No. 44.]

3. Defendant Yasiel Puig is a Major League Baseball player for the Los Angeles Dodgers whose schedule requires frequent travel. Due to Mr. Puig's schedule, undersigned counsel has been unable to confer with Mr. Puig to finalize defendants' answer and affirmative defenses to the second amended complaint. Undersigned counsel anticipates that the one-week extension of time sought herein will be sufficient time to confer with defendants and finalize their answer.

4. 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 8, 2014, in which to file their answer 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,

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By: /s/ Sean R. Santini _____

Sean R. Santini

Florida Bar No. 832898

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 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

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