

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MIGUEL ANGEL CORBACHO DAUDINOT

Plaintiff,

CASE NO.: 1:13-cv-22589-KMW

v.

YASIEL PUIG VALDES a/k/a YASIEL PUIG  
and MARITZA VALDES GONZALEZ.Defendants.  

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**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO DEFENDANTS' MOTION TO DISMISS [DE 7]**

Plaintiffs, by and through the undersigned counsel, and pursuant to Fed. R. Civ. P. 6(b)(1)(A), respectfully move for a 7-day extension of time to respond to Defendants' Motion to Dismiss [DE 7], and in support thereof state :

1. Defendants filed a Motion to Dismiss [DE 7] on August 22, 2013. Plaintiffs' response to Defendants' motion is due on September 5, 2013.
2. When Defendants' motion was filed, the undersigned counsel was away from the office on a previously scheduled vacation. Upon her return, the undersigned received Plaintiffs' motion, among other legal work that accumulated during the short period counsel was away. Due to the enormity of her workload, and the many issues raised in Defendants' motion, the undersigned counsel is unable to prepare Plaintiffs' response by September 5, 2013, and respectfully requests a 7-day extension of time in which to submit a response.
3. In anticipation that Plaintiffs would be unable to meet the September 5 deadline, the undersigned counsel contacted Defendants' counsel, Sean R. Santini, and, after explaining the undersigned's need for additional time, asked Mr. Santini if Defendants' would be willing to agree to provide Plaintiffs with a 7-day enlargement of time to file a response to Defendants' motion. Mr. Santini graciously agreed.

4. The 7-day extension of time sought in the instant motion will not unduly delay these proceedings or prejudice any of the parties.

WHEREFORE, the Plaintiffs respectfully request that this honorable court enter an order granting them a 7-day extension of time, up to and including September 12, 2013, in which to submit their response to Defendants' Motion to Dismiss [DE 7].

**Local Rule 7.1(a)(3) Certification**

Undersigned counsel has conferred in writing with counsel for Defendants, Sean R. Santini, regarding this motion and certifies that Mr. Santini has no objection to the 7-day extension of time sought herein.

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