

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO.: 06-81016-CIV-RYSKAMP/Vitunac

McTECH CORPORATION, :
 :
 Plaintiff, :
 :
 vs. :
 :
 SIM-G TECHNOLOGIES, LLC, :
 :
 Defendant. :
 _____ :

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO AMENDED COMPLAINT**

Defendant, Sim-G Technologies, LLC ("Sim-G"), by and through its undersigned attorneys, moves for an enlargement of time, through and including December 15, 2006, to respond to Plaintiff's Amended Complaint, and states:

1. Plaintiff's Amended Complaint was served on November 16, 2006 by regular mail upon Sim-G's registered agent.
2. Pursuant to Rules 6(a), 6(e) and 15(a), Federal Rules of Civil Procedure, Sim-G's response is due by December 4, 2006.
3. This action concerns a dispute between Plaintiff (a sub-contractor) and Sim-G (the general contractor) over work performed in connection with a federal construction project. The facts and issues are complex, and Sim-G requires additional time to conduct its due diligence in order to file an appropriate response to Plaintiff's Amended Complaint. In addition, Sim-G intends to file a Counterclaim and requires additional time to conduct its

due diligence in relation thereto.

4. This Motion is not filed for the purpose of delay, or for any other improper purpose.

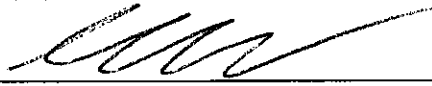
5. The undersigned contacted Plaintiff's counsel, Maurice Garcia on November 22, 2006 in accordance with Local Rule 7.1(A)(3). Mr. Garcia has consented to the relief sought herein.

WHEREFORE, Defendant, Sim-G Technologies, LLC, respectfully requests an enlargement of time, through and including December 15, 2006, to respond to Plaintiff's Amended Complaint.

Respectfully submitted,

BLANK ROME LLP
Attorneys for Sim-G Technologies, LLC
1200 North Federal Highway, Suite 417
Boca Raton, Florida 33432
(561) 417-8100 Telephone
(561) 417-8101 Facsimile

By: _____


Steven A. Lessne, Esq.
Florida Bar No. 107514
Howard M. Camerik, Esq.
Florida Bar No. 703435

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served via facsimile and regular U.S. Mail this 22nd day of November, 2006 upon: Maurice M. Garcia, Esq., Greenspoon Marder, P.A., Trade Center South, Suite 700, 100 West Cypress Creek Road, Fort Lauderdale, Florida 33309 (Facsimile: 954/267-8015).

