

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

CASE NO.: 50-2018-CA-002317-XXXX-MB

WALTER E. SAHM and
PATRICIA SAHM

Plaintiffs,

v.

BERNSTEIN FAMILY REALTY, LLC and
ALL UNKNOWN TENANTS.

Defendant

/

**MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' THIRD
AMENDED COMPLAINT FOR FORECLOSURE**

COMES NOW, Defendant, Brian O'Connell, as Successor Personal Representative of the Estate of Simon L. Bernstein ("Mr. O'Connell"), by and though undersigned counsel, and hereby files this Motion for Extension of Time to Respond to Plaintiffs' Third Amended Complaint for Foreclosure, and in support thereof, states as follows:

1. On or about June 18, 2019, Plaintiffs, Walter E. Sahm, individually, and Patricia Sahm, individually (collectively, "Plaintiffs"), filed Plaintiffs' Motion for Leave to File Third Amended Complaint for Foreclosure.
2. On or about July 29, 2019, the Court entered the Agreed Order on Plaintiffs' Motion for Leave to File Third Amended Complaint for Foreclosure, by which the Third Amended Complaint for Foreclosure (the "Third Amended Complaint") was deemed filed as of June 18, 2019.
3. Mr. O'Connell's response to the Third Amended Complaint is due August 19, 2019.

4. Due to previously scheduled obligations, the press of other business, including trials, depositions, mediations, and hearings, Mr. O'Connell respectfully requests an extension of time of thirty (30) days, or to through and including September 17, 2019 for Mr. O'Connell to respond to the Third Amended Complaint.

5. Plaintiffs would not be prejudiced by this extension, and Plaintiffs have no objection to same.

WHEREFORE, Defendant, Brian O'Connell, as Successor Personal Representative of the Estate of Simon L. Bernstein, respectfully requests this Court enter an order granting an extension of time of thirty (30) days, or to through and including September 17, 2019 to respond to the Third Amended Complaint.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished via e-service this 19th day of August, 2019, to Eliot Ivan Bernstein, 2753 NW 34th St., Boca Raton, FL 33434, (iviewit@iviewit.tv); and Robert A. Sweetapple, 4800 N. Federal Highway, Suite B105, Boca Raton, FL 33431, pleadings@sweetapplelaw.com.

/s/ Ashley Crispin Ackal

BRIAN M. O'CONNELL, ESQUIRE
Florida Bar No. 308471
ASHLEY CRISPIN ACKAL, ESQUIRE
Florida Bar No. 37495
JOIELLE A. FOGLIETTA, ESQUIRE
Florida Bar No. 94238
CLARA C. CIADELLA
Fla. Bar No.: 106323
O'Connell & Crispin Ackal
420 Royal Palm Way
Suite 300
Palm Beach, Florida 33480
Telephone: (561) 355-0403
Fax: (561) 355-5133

Primary e-mail address:
service@OCAlawyers.com