IN THE CIRCUIT COURT OF THE 17TH JUDICAL CIRCUIT IN AND FOR BROWARD COUNTY FLORIDA

CASE NO.: CACE 21-006666 (09)

PAUL K. SANCHEZ,

Plaintiff,

vs.

POMPANO SENIOR SQUADRON FLYING CLUB, INC., a/k/a POMPANO BEACH FLYING CLUB,

Defendant,

POMPANO SENIOR SQUADRON FLYING CLUB, INC., d/b/a POMPANO BEACH FLYING CLUB, a Florida corporation,

Third Party Plaintiff,

VS.

CARL L. KENNEDY, II,

Third Party Defendant.

PLAINTIFF'S SANCHEZ'S MOTION FOR EXTENSION OF TIME

COMES NOW the Plaintiff, PAUL SANCHEZ, ("SANCHEZ") by and through his undersigned counsel and hereby files this Motion to Extend Time to Respond to Defendant/ Third Party Plaintiff's Affirmative Defenses and Counter-Claim and in support thereof would state as follows:

 That Defendant/Third Party Plaintiff filed its Affirmative Defenses and Counter-Claim on December 21, 2021. 2. That Plaintiff is in need of additional time to formulate his responses to

Defendant/Third Party Plaintiff's Affirmative Defenses and Counter-Claim.

3. That no prejudice to the Defendant/Third Party Plaintiff will occur by virtue of

Granting this Motion.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order

Granting this Motion and to award Plaintiff any additional relief that it may deem just

and reasonable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of January, 2022, a true and correct

copy of the foregoing was served on all counsel of record and pro se parties identified on

the attached Service List in the manner specified.

Respectfully submitted,

By: /s/ Robert J. Puzio

ROBERT J. PUZIO

Florida Bar No.: 622516

THE LITIGATION DEFENSE GROUP, LLC

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2