

IN THE CIRCUIT COURT OF THE
17TH JUDICIAL 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.

PLAINTIFF SANCHEZ'S MOTION FOR EXTENSION OF TIME

COMES NOW the Plaintiff, **PAUL K. SANCHEZ**, ("**SANCHEZ**") by and through his undersigned counsel and hereby files this Motion for Extension of Time to Respond to Defendant's Request for Production of Documents and Interrogatories and in support thereof would state as follows:

1. That Plaintiff **SANCHEZ** was served with Defendant's Request for Production of Documents and Interrogatories on December 1, 2021.
2. That at this time Plaintiff **SANCHEZ** requires additional time to respond to the Defendant's Request for Production of Documents and Interrogatories.
3. The parties to this action will not be prejudiced by the granting of this Motion.

WHEREFORE, Plaintiff, **SANCHEZ** respectfully requests that the Court grant the foregoing Motion and grant any additional relief that the Court 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
Attorney for Plaintiff
1040 Bayview Drive
Suite 520
Fort Lauderdale, Florida 33304
Telephone: (954) 489-7766
Facsimile: (954) 489-7664
Primary E-Mail: puziolaw@bellsouth.net

SERVICE LIST

Edward F. Holodak, Esquire
7580 NW 5th Street, Suite 15125
Plantation, Florida 33317
Attorney for Defendant
pleadings@holodakpa.com
(via: Electronic Mail)