

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

CASE NO: 20-CV-00862-VMC/TWG

BURTON W. WIAND, as Receiver for
OASIS INTERNATIONAL GROUP, LTD.,
OASIS MANAGEMENT, LLC and
SATELLITE HOLDINGS COMPANY,

Plaintiff

vs.

CHRIS AND SHELLY ARDUINI, et.al.,

**DEFENDANTS', BRADLEY KANTOR AND CARRIE KANTOR, UNOPPOSED
MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO COMPLAINT AND
INCORPORATED MEMORANDUM OF LAW**

Defendants, BRADLEY KANTOR and CARRIE KANTOR, by and through their undersigned counsel and pursuant to Fed.R.Civ.P. 6 and Local Rule 3.01, M.D. Fla., respectfully moves this Honorable Court for an enlargement of time of fourteen (14) days in which to respond to Plaintiffs' Complaint. In support hereof, Defendant states as follows:

1. The undersigned has just been retained in the instant matter.
2. The instant motion is filed before Defendants' responses to the Complaint are due.

Defendants respectfully request a fourteen (14) day enlargement of time to respond to the Complaint.

3. The requested enlargement, if granted, will provide the parties the opportunity to explore the possibility of an early resolution of this action, and prepare a proper response to the Complaint.

4. The enlargement will not prejudice any party, and is not sought for the purpose of any undue delay.

Local Rule 3.01(g) Good Faith Certificate

Pursuant to Local Rule 3.01(g), M.D. Fla., the undersigned certifies that they have conferred with counsel for Plaintiff via e-mail on July 15, 2020, regarding the relief sought in this motion, and that Plaintiff has no objection to the requested enlargement.

Memorandum of Law

Rule 6 of the Federal Rules of Civil Procedure provides that when an act may or must be done within a specified time, the court may, for good cause, extend the time if the request is made before the original time expires. Fed.R.Civ.P. 6(b)(1)(A). Defendants respectfully suggest there is good cause for the requested enlargement. Specifically, the requested enlargement will provide the parties the opportunity to explore the possibility of an early resolution of this action. Defendants make this request before the expiration of the time for responding to the Complaint.

WHEREFORE, Defendants, BRADLEY KANTOR and CARRIE KANTOR, respectfully request that this Honorable Court enter an Order: (i) GRANTING this motion; (2) GRANTING an enlargement of fourteen (14) days for Defendants to respond to the Complaint; and Iiii) GRANTING such additional relief as the Court deems appropriate.

Respectfully submitted,

WHITELOCK & ASSOCIATES, P.A.

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Counsel for Defendant, Bradley Kantor and

Carrie Kantor



CHRISTOPHER J. WHITELOCK

Florida Bar No. 067539

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on this 15th day of July, 2020, the foregoing document was electronically filed with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to: Jared J. Perez, Esq., Larry Dougherty, Esq., WIAND GUERRA KING, P.A., 5505 West Gray Street, Tampa, FL 33609, e-mail: jperez@wiandlawcom and ldougherty@wiandlaw.com.



CHRISTOPHER J. WHITELOCK