

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
RECEIVER'S DISCOVERY REQUESTS

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 two (2) weeks, in which to respond to Receiver's First Set of Interrogatories, First Request for Admissions and First Request for Production, and states as follows:

1. The Receiver's discovery requests were filed on November 23, 2020, and the Defendants, Bradley Kantor and Carrie Kantor's, responses are due on January 12, 2021.
2. Defendants, Bradley Kantor and Carrie Kantor, are currently quarantined in a hotel due to COVID-19 until January 21, 2021.
3. As such, the Defendants hereby request an extension, up through and including January 26, 2021, in which to file said discovery responses.
4. This request is submitted in good faith and not for the purposes of 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 telephone on January 12, 2021, 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 discovery requests.

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 two (2) weeks for Defendants to respond to the Plaintiff's discovery requests; and (iii) GRANTING such additional relief as the Court deems appropriate.

Respectfully submitted,

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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 12th day of January, 2021, 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: John W. Waechter, Esq., Englander and Fischer, LLP, 721 First Avenue North, St. Petersburg, FL 33731, e-mail: jwaechter@eflegal.com, dturner@eflegal.com, and 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