

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

WILLIAM E. STANSBURY,

CASE NO. 502012CA013933XXXXMB (AO)

Plaintiff,

v.

ESTATE OF SIMON L. BERNSTEIN and
BERNSTEIN FAMILY REALTY, LLC,

Defendants.

PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO DISCOVERY REQUESTS

Plaintiff, William E. Stansbury, (hereinafter "Stansbury"), by and through his undersigned counsel, and pursuant to Rule 1.090(e) of the Florida Rules of Civil Procedure, hereby files his Motion for Enlargement of Time to respond to the discovery requests of Defendant, Estate of Simon L. Bernstein, and as good cause therefore would show onto the Court as follows:

1. On June 22, 2017, Defendant, Estate of Simon L. Bernstein ("Bernstein Estate"), served interrogatories and a request for production of documents (collectively "discovery requests") on Stansbury. Stansbury has until July 24, 2017 to respond to the discovery requests and produce non-privileged, responsive documents.

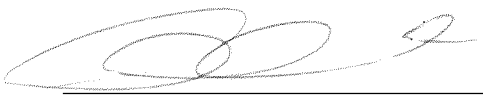
2. Counsel for Stansbury has engaged his full-time and immediate attention on pressing matters relating to other pending cases and has been unable to confer with Stansbury to finalize responses to the discovery requests and compile responsive documents to be produced.

3. Accordingly, Stansbury requests a thirty (30) day enlargement of time to respond to the discovery requests and compile all responsive, non-privileged documents, up through and including August 23, 2017.

4. This request for an enlargement of time is not interposed for purposes of delay. Stansbury has not sought an extension of time on prior occasion in this matter. The Bernstein Estate will not be unduly prejudiced by the granting of the requested relief.

5. Counsel for Stansbury will contact counsel for the Bernstein Estate in advance of any attempt to schedule a hearing in an effort to reach an agreement on the relief requested in the within motion.

WHEREFORE, Plaintiff, William E. Stansbury, respectfully requests the entry of an Order granting his motion for an enlargement of time to respond to the interrogatories and request for production served by Defendant, Estate of Simon L. Bernstein, and extend a thirty (30) day extension of time, up through and including August 23, 2017, to respond to the discovery requests and produce responsive documents and for such other and further relief as this Court deems just and proper.


Peter M. Feaman, Esquire

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by electronic service through the E-filing Portal to Email: Brian M. O'Connell, Esq. (*Personal Representative of the Defendant, Estate of Simon L. Bernstein*) 515 North Flagler Drive, 20th Floor, West Palm Beach, FL 33401, Email: boconnell@ciklinlubitz.com; service@ciklinlubitz.com; Alan Rose, Esq. (*Counsel for Defendant, Estate of Simon L. Bernstein*), PAGE, MRACHEK, 505 So. Flagler Drive, Suite 600, West Palm Beach, FL 33401, arose@pm-law.com and mchandler@pm-law.com; and, Eliot and Candice Bernstein, as parents and natural guardians of Joshua, Jake and Daniel Bernstein (*for Defendant, Bernstein Family Realty, LLC*) 2753 Northwest 34th Street, Boca Raton, FL 33434, Email: ivewit@ivewit.tv; ivewit@gmail.com; tourcandy@gmail.com, on this 13th day of July, 2017.

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