

IN THE CIRCUIT COURT OF THE 15<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR  
PALM BEACH COUNTY, FLORIDA

CASE NO.: 50-2018-CA-002317-XXXX-MB

WALTER E. SAHM and  
PATRICIA SAHM

Plaintiffs,

v.

BERNSTEIN FAMILY REALTY, LLC,  
BRIAN O'CONNELL, AS SUCCESSOR  
PERSONAL REPRESENTATIVE OF  
THE ESTATE OF SIMON L. BERNSTEIN;  
ALEXANDRA BERNSTEIN, ERIC BERNSTEIN,  
MICHAEL BERNSTEIN, MOLLY SIMON,  
PAMELA B. SIMON, JILL IANTONI,  
MAX FRIEDSTEIN, LISA FRIEDSTEIN,  
INDIVIDUALLY AND TRUSTEES OF  
THE SIMON L. BERNSTEIN REVOCABLE  
TRUST AGREEMENT DATED MAY 20, 2008,  
AS AMENDED AND RESTATED;  
ELIOT BERNSTEIN, AND CANDICE  
BERNSTEIN, INDIVIDUALLY AND AS  
NATURAL GUARDIANS OF MINOR  
CHILDREN JO., JA. AND D. BERNSTEIN;  
AND ALL UNKNOWN TENANTS.

Defendants.

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANTS' MOTIONS FOR REHEARING**

Plaintiffs, WALTER E. SAHM and PATRICIA SAHM, by and through their undersigned counsel, hereby serve this motion for extension to respond to the Defendants' Motions for Rehearing and state as follows:

1. On December 23, 2021, this Honorable Court issued a Final Judgment of Foreclosure.

2. On January 5, 2022, Defendants, Joshua Ennio Zander Bernstein, Jacob Noah Archie Bernstein, and Daniel Elijsha Abe Ottomo Bernstein filed a Motion for rehearing.
3. On January 6, 2022, Defendants, Candice Bernstein and Eliot I. Bernstein each filed their motions for hearing.
4. On January 11, 2022, this Honorable Court issued an Order for Plaintiffs to respond to Defendants, Joshua Ennio Zander Bernstein, Jacob Noah Archie Bernstein, and Daniel Elijsha Abe Ottomo Bernstein, within 10 days. The Response is due by January 21, 2022.
5. On January 12, 2022, this Honorable Court issued an Order for Plaintiffs to respond to Defendants, Candice Bernstein and Eliot I. Bernstein's, motions for rehearing, within 10 days. The Response would be due on Saturday, January 22, 2022.
6. Since the time that the Orders were issued, Plaintiffs' counsel has been in the depths of preparing an Answer Brief for a 3<sup>rd</sup> DCA Appellant case currently due February 1, 2022 and requests a ten (10) extension to respond to all Motions for Rehearing in this case.
7. This extension is sought in good faith and not for the purposes of delay or other improper propose and the granting of this extension will not prejudice any party.
8. Plaintiffs' counsel has attempted to reach out to Defendants via telephone to inquire if they had any opposition to the extension requests, but Plaintiffs' counsel was not able to confirm or deny if any of them oppose this extension request as of the filing of this motion.

**WHEREFORE**, Plaintiffs, WALTER SAHM and PATRICIA SAHM, move this Honorable Court for the entry of an order extending the time for Plaintiffs to respond to Defendants' Motions for Rehearing by ten (10) days.

Respectfully submitted,

SWEETAPPLE, BROEKER & VARKAS, PL  
*Attorneys for the Plaintiffs*  
4800 N Federal Hwy, Suite D306  
Boca Raton, Florida 33431  
Telephone: (561) 392-1230  
E-Mail: pleadings@sweetapplelaw.com

By: /S/ Robert A. Sweetapple  
**ROBERT A. SWEETAPPLE**  
Florida Bar No. 0296988  
**NAOMI ALZATE**  
Florida Bar No. 112822

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished via the E-Filing Portal this 21<sup>st</sup> day of January, 2022 in compliance with Rule 2.516 of the Florida Rules of Judicial Administration upon all parties of record.

By: /S/ Robert A. Sweetapple  
**ROBERT A. SWEETAPPLE**  
Florida Bar No. 0296988  
**NAOMI ALZATE**  
Florida Bar No. 112822