

IN THE CIRCUIT COURT OF THE 15TH
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' SECOND 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 Rehearing.
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 was 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 was due on Saturday, January 22, 2022.
6. On January 21, 2022, Plaintiffs filed a motion for extension of time to respond to motions for rehearing requesting a 10-day extension.
7. Plaintiffs' counsel has been involved in the depths of preparing an Answer Brief for a 3rd DCA Appellant case currently due February 1, 2022 and requests an additional ten (10) day extension to respond to all Motions for Rehearing in this case, making responses due to all 3 Motions for Rehearing on February 10, 2022.
8. 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.
9. 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 for an additional (10) days, making responses due on February 10, 2022.

Respectfully submitted,

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By: /S/ Robert A. Sweetapple
ROBERT A. SWEETAPPLE
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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 28st 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
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