IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA

Case No. 2:21-cv-21679

FRANCISCO INDUSTRIES, INC.,

Plaintiff,

v. THE HONORABLE MARCIA G. COOKE

ASR GROUP INTERNATIONAL, INC.,

Defendant.
_____/

UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE A RESPONSE TO PLAINTIFF'S COMPLAINT

Defendant, ASR GROUP INTERNATIONAL, INC., ("Defendant"), moves pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, for an extension of time to file a response to Plaintiff's *Complaint*, filed on May 2, 2021 [DE 1] ("Complaint"), to and including June 23, 2021. The grounds supporting this unopposed motion are set forth below in the accompanying memorandum of law.

MEMORANDUM OF LAW

Under present deadlines, Defendant's response to the Complaint is due on May 24, 2021. Undersigned counsel requests a thirty (30) day extension, up to and including June 23, 2021. This extension is necessary as a result of current deadlines in other matters and to give sufficient time for counsel to acquaint themselves with the case and to prepare a response to the Complaint. The amount of time sought is the minimum amount of time needed to prepare a response to the Complaint.

This unopposed Motion is not filed for any improper purpose and the amount of time sought is reasonable. Plaintiff will not be prejudiced by the requested extension. This Court has authority pursuant to Rule 6 of the Federal Rules of Civil Procedure to grant extension of time, when as here, justice so requires.

CONCLUSION

On the basis of the foregoing, Defendant respectfully requests that the Court grant its Unopposed Motion for Extension of Time to Serve a Pleading or Motion in Response to the Complaint, to and including June 23, 2021. A proposed Order is attached to this Motion as Exhibit "A".

CERTIFICATE OF GOOD FAITH CONFERENCE

I hereby certify that undersigned counsel for the movant conferred with Plaintiff's counsel, in good faith effort to resolve the issues and Plaintiff's counsel does not oppose the relief requested in this motion.

Dated: May 21, 2021

RASCO KLOCK PEREZ & NIETO, P.L.

By: s/ Joseph P. Klock, Jr.

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EXHIBIT A

IN THE UNITED STATES DISTRICT COURT FOR THE
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Case No. 2:21-cv-21679

FRANCISCO INDUSTRIES, INC.,

Plaintiff,

v. THE HONORABLE MARCIA G. COOKE

ASR GROUP INTERNATIONAL, INC.,

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_____/

ORDER ON UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE A RESPONSE TO PLAINTIFF'S COMPLAINT

THIS CAUSE came before the Court on the Unopposed Motion for an Extension of Time to File a Response to Plaintiff's Complaint ("Motion"). The Court has reviewed the Motion and being otherwise duly advised therein, it is hereby

ORDERED AND ADJUDGED that

1. Defendant's Motion be and the same is hereby GRANTED.

2. Defendant shall have up to and including June 23, 2021 to file a response to Plaintiff's Complaint.

DONE AND ORDERED in chambers in Miami, Florida this ___ day of May, 2021.

_____
MARCIA G. COOKE
United States District Judge

Copy furnished to all Counsel of Record

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