## IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE: THE MATTER OF:	CASE NO. 50-2019-CA-013860-XXXX-MB
GABE HOFFMAN,	DIVISION: AE
Plaintiff/Petitioner, vs.	
THOMAS SCHOENBERGER.	
Defendant/Respondent.	

## PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE MANDATORY CASE MANAGEMENT REPORT

The Plaintiff, GABE HOFFMAN, by and through the undersigned counsel, hereby files this Motion for Extension of Time to File Mandatory Case Management Report, and in support thereof, states as follows:

- (1) The undersigned counsel was recently retained by the Plaintiff, and filed a Notice of Appearance in this matter on August 6, 2021.
- (2) As such, the undersigned counsel needs additional time to review the file, consult with the Plaintiff, and confer with counsel for the Defendant prior to filing a Case Management Report in this matter.
- (3) It should be noted that counsel for the Defendant filed a Notice of <u>Limited</u> Appearance in this lawsuit, which does not specify what issues his representation is to be limited.

  It is unclear whether counsel for the Defendant will be representing the Defendant with regard to the filing of a Case Management Report and/or prospective matters in this litigation.

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(4) The requested extension of time is not meant to delay these proceedings, and a short extension of time for the undersigned counsel to get up to speed in this matter will not prejudice the Defendant.

WHEREFORE, the Plaintiff, GABE HOFFMAN, respectfully requests an extension of time to file a Mandatory Case Management Report, and to grant any other relief deemed just and proper.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via Florida Courts E-Filing Portal to: G. Baron Coleman, Esq., Attorney to the Defendant, 3 South Jackson Street, P.O. Box 789, Montgomery, Alabama 36101-0789, baron@baroncoleman.com, on August 19, 2021.

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By: /s/ Kim L. Picazio

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