

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

JONATHAN E. PERLMAN, Esq. as court  
appointed receiver of Creative Capital  
Consortium, LLC et al.,

Plaintiffs,

v.

REGENCY REALTY GROUP, INC.,

Defendant/Third-Party Plaintiff,

CASE NO.: 12-cv-80486-DTKH

v.

THOMAS WEISZ, an individual; BARBARA  
KRAMER, an individual; LAWRENCE  
KRAMER, an individual; CARLOS  
BONILLA, an individual; and GEORGE  
THEODULE, an individual,;

Third-Party Defendants.

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**STIPULATED MOTION TO EXTEND DEADLINE  
TO DISCLOSE EXPERT WITNESSES**

Plaintiff, Jonathan Perlman as receiver for Creative Capital Consortium, LLC, Defendant, Regency Realty Group, Inc., and Third-Party Defendants, Thomas Weisz, Barbara Kramer, Lawrence Kramer, and Carlos Bonilla, by and through their undersigned counsel, hereby move the Court to extend the deadline to disclose expert witnesses and in support thereof state as follows.

1. Pursuant to the Court's Order Resetting Trial Date and Discovery Deadlines (Doc. 22), the parties must exchange expert witness reports by no later than ninety (90) days prior to the call of the calendar, if any expert opinion testimony is to be offered at trial.

2. Since the Calendar Call in this case is on April 1, 2013, the current deadline for disclosing experts is December 21, 2012.

3. Discovery is on-going in this case. Thus, the parties are in need of additional time to provide their experts with sufficient documentation in order to allow them to render their opinion(s) in this case.

4. In order to allow the parties a sufficient opportunity to develop the facts in the case, the parties respectfully request an extension of the current expert disclosure deadline.

5. In addition, the parties have agreed that the Plaintiff should disclose its expert(s) first, and then the Defendant and Third-Party Defendants should disclose their expert(s) twenty (20) days thereafter.

6. Therefore, the parties request that this Court enter an order extending the current expert disclosure deadlines such that Plaintiff's deadline for expert disclosure is January 15, 2013 and Defendant's and Third-Party Defendants' deadline for expert disclosure is February 4, 2013.

7. This extension will not affect the trial date, or any other pre-trial deadline in this case.

8. The parties makes this request in good faith and not for the purposes of delay.

9. Pursuant to Local Rule 7.1 a proposed order is attached as Exhibit A.

WHEREFORE, Plaintiff, Defendant, and Third-Party Defendants respectfully move this Court to enter an order extending the current expert disclosure such that such that Plaintiff's deadline for expert disclosure is January 15, 2013 and Defendant's and Third-Party Defendants' deadline for expert disclosure is February 4, 2013.

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CASE NO.: 12-cv-80486-DMM

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THOMAS WEISZ, an individual; BARBARA  
KRAMER, an individual; LAWRENCE  
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**ORDER GRANTING STIPULATED MOTION TO EXTEND DEADLINE  
TO DISCLOSE EXPERT WITNESSES**

THIS MATTER, having come before the Court upon the parties' Stipulated Motion for Extend Deadline to Disclose Expert Witnesses (the "Motion"), and the Court having reviewed the Motion and being otherwise fully advised in the premises, it is hereby **ORDERED AND ADJUDGED** as follows:

1. The Motion is **GRANTED**.
2. Plaintiff shall January 15, 2013 to disclose its expert(s), which shall include the Rule 26(a)(2)(B) requirement for the disclosure of written expert reports which conform to the prescriptions of this Rule.

3. Defendant and Third-Party Defendants shall have until February 4, 2013 to disclose their expert(s), which shall include the Rule 26(a)(2)(B) requirement for the disclosure of written expert reports which conform to the prescriptions of this Rule.

**DONE AND ORDERED** in Chambers, in West Palm Beach, Florida this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

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HONORABLE DANIEL T. K. HURLEY  
UNITED STATES DISTRICT JUDGE

cc: All counsel of record