

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(West Palm Beach Division)

CASE NO.: 09-CV-81221-CIV- HURLEY/HOPKINS

JONATHAN E. PERLMAN, Esq., as court
Appointed Receiver of Creative Capital
Consortium, LLC, et al.,

Plaintiff,

v.

MILLENIU EXECUTIVE REALTY, INC.
and NILDA RIVERA-CRUZ,

Defendants.

**DEFENDANTS', MILLENIU EXECUTIVE REALTY, INC.
AND NILDA RIVERA-CRUZ', AGREED MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants, MILLENIU EXECUTIVE REALTY, INC. and NILDA RIVERA-CRUZ (hereinafter referred to as "Defendants MILLENIU AND CRUZ") by and through their undersigned counsel, hereby move this Court for an extension of time within which to respond to Plaintiff's Complaint, up to and including Wednesday, November 25, 2009, and in support thereof, states:

1. The undersigned counsel obtained a verbal extension of time, from counsel for Plaintiff, to and including Wednesday, November 25, 2009, within which Defendants Millenium and Cruz shall answer or otherwise plead to Plaintiff's Complaint.

2. Pursuant to Local Rule 7.1, the undersigned has consulted with counsel for the Plaintiff, Harris Jacob Koroglu, Esquire, who agrees to the requested extension.

3. Consequently, Defendants Millenium and Cruz would respectfully request an additional extension of time within which to respond to Plaintiff's Complaint, up to and including Wednesday, November 25, 2009 within which to answer or otherwise plead to Plaintiff's Complaint.

4. The instant Motion is filed in good faith so as to adequately preserve the rights of Defendants, Millenium and Cruz, and not for purposes of undue delay or prejudice.

WHEREFORE, Defendants, MILLENIUM EXECUTIVE REALTY, INC. and NILDA RIVERA-CRUZ, would respectfully request that this Court enter an Order GRANTING said Defendants' Agreed Motion for Extension of Time, giving said Defendants until Wednesday, November 25, 2009, within which to file a responsive pleading in this matter, and granting such other and further relief as the Court deems appropriate.

Respectfully submitted this 6th day of November, 2009.

/s/ Dennis A. Creed, III

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Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on **November 6, 2009**, I electronically filed the foregoing Agreed Motion for Extension of Time To Respond to Plaintiff's Complaint with the Clerk of the Court by using the CM/ECF system, which will serve copies on counsel for Plaintiff or pro se parties as listed on the attached service list, via transmission of Notices of Electronic Filing generated by CM/ECF:

/s/ Dennis A. Creed, III

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MILLENIU EXECUTIVE REALTY, INC.
and NILDA RIVERA-CRUZ,

Defendants.

**ORDER GRANTING DEFENDANTS', MILLENIU EXECUTIVE REALTY,
INC.'S AND NILDA RIVERA-CRUZ', AGREED MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

THIS CAUSE came on before the Court on Defendants', MILLENIU EXECUTIVE REALTY, INC.'S and NILDA RIVERA-CRUZ' Agreed Motion for Extension of Time to Respond to Plaintiff's Complaint, and the Court having considered the Motion and the pertinent portion of the record, it is,

ORDERED AND ADJUDGED:

1. Defendants', MILLENIU EXECUTIVE REALTY, INC.'S and NILDA RIVERA-CRUZ', Agreed Motion for Extension of Time to Respond to Plaintiff's Complaint is hereby **GRANTED**.

2. Defendants shall serve their response to Plaintiff's Complaint not later than Wednesday, November 25, 2009.

Daniel T. K. Hurley
United States District Court Judge

Copies to:

All Counsel of Record