

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF FLORIDA

JONATHAN E. PERLMAN, ESQ.,  
as court appointed Receiver of  
Creative Capital Consortium, LLC, et al.,

Plaintiff,

v.

CIVIL ACTION NO.: 09-CV-81222-  
DIMITROULEAS/SNOW

DEAN, MEAD, EGERTON, BLOODWORTH,  
CAPOUANO & BOZARTH, P.A.,

Defendant.

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**UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT**

Defendant, DEAN, MEAD, EGERTON, BLOODWORTH, CAPOUANO &  
BOZARTH, P.A. (“Dean Mead”) files this Unopposed Motion for Extension of Time to  
Respond to Complaint, and as grounds therefore, states:

1. The Complaint was filed on August 21, 2009.
2. Dean Mead was served with the Complaint on September 2, 2009. Its answer was due September 23, 2009.
3. Dean Mead has been in contact with counsel for the Plaintiff and provided information in an attempt to determine whether the matter may be resolved without further litigation. Counsel for the Plaintiff is reviewing the information.
4. Plaintiff has agreed to an extension of time for Dean Mead to file its response to the Complaint while the parties review whether the matter can be resolved.

5. Accordingly, Dean Mead requests an extension of time to respond to the Complaint within seven business days after Plaintiff's counsel requests, in writing, a response or until October 30, 2009, whichever is earlier. Plaintiff has agreed to the requested relief.

6. Dean Mead also asks that it be allowed to move for an additional extension of time to respond should the parties' discussions continue after October 30, 2009.

7. This request is made in good faith, and not for the purposes of delay. The extension requested will not prejudice any party, or this Court.

8. Pursuant to local rule 7.1(A)(2) a proposed order is attached hereto.

Wherefore, Defendant respectfully requests an extension of time to respond to the complaint until October 30, 2009.

**Certificate of Pre-filing Conference**

The undersigned confirms that, pursuant to local rule 7.1(A)(3), she has conferred with counsel for the Plaintiff who agrees to the relief requested herein.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 24, 2008 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

/s/ Nichole M. Mooney \_\_\_\_\_  
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Attorneys for the Defendant, Dean, Mead,  
Egerton, Bloodworth, Capouano & Bozarth,  
P.A.

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\_\_\_\_\_/

**ORDER GRANTING UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

THIS CAUSE having come to be heard on Defendant's Unopposed Motion for Extension of Time to Respond to Complaint, and the Court being duly advised of the premises, IT IS HEREBY ORDERED AND ADJUDGED:

1. Defendant's motion is GRANTED.
2. Defendant shall have seven business days after Plaintiff's counsel requests, in writing, a response to the Complaint, or until October 30, 2009, whichever is earlier, to respond.
3. If necessary, the Defendant may request an additional extension of time to respond to the complaint upon showing of good cause.

ENTERED this \_\_\_\_\_ day of \_\_\_\_\_, 2009.

BY THE COURT:

\_\_\_\_\_  
Judge