

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.

**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. Since receipt of the Complaint, Dean Mead has been in contact with counsel for the Plaintiff in an ongoing attempt to resolve this matter without further litigation.
4. Dean Mead currently sought and this Court granted an extension of time to respond to the Complaint through and including October 30, 2009.

5. Counsel for the Plaintiff has reviewed information provided by Dean Mead and has recently requested additional information. Dean Mead is gathering and providing this information for counsel's consideration.

6. Dean Mead is in need of additional time to gather the requested information and allow counsel for the Plaintiff to review the same to determine if the matter can be resolved.

7. 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.

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

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

10. 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.

11. 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 November 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 October 30, 2009 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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_____/

**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 calendar days after Plaintiff's counsel requests, in writing, a response to the Complaint, or until November 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