

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY,
FLORIDA

NAOMI ARCE

Plaintiff,

Vs.

CASE NUMBER: 07-24152 CA 09

JUDGE: WILSON, JR.

MAGNUM CONSTRUCTION
MANAGEMENT CORPORATION
A Florida Corporation, and,
STONE AGE PAVERS, INC.,
A Florida Corporation,

Defendant.

CLERK OF COURT
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2009 DEC 10 AM 8:47
COURT REPORTER

**MOTION FOR EXTENSION OF TIME TO
RESPOND TO PROPOSAL FOR SETTLEMENT**

COMES NOW, the Plaintiff, NAOMI ARCE, by and through the undersigned counsel and pursuant to Florida Rule of Civil Procedure 1.090(b) and files this Motion for Extension of time to Respond to Proposal for Settlement filed by Defendants STONE AGE PAVERS, INC. and would state that:

1. On or about November 10, 2009, defendant, STONE AGE PAVERS, INC., by and through counsel filed a proposal for settlement pursuant to Florida Rule of Civil Procedure 1.442 and §768.79 Florida Statutes.
2. Plaintiff will require additional time to respond to said proposal for settlement.
3. Plaintiff makes this request in good faith and not for the purposes of delay.

WHEREFORE, Plaintiff respectfully requests the Court's order allowing an extension of time to respond to Defendants' Proposal for Settlement and any further relief that this Court finds just and proper.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been mailed to Peter Weinstein, Esq. 8100 S.W. 10th Street, Suite 2500, Plantation, FL 33324 and Dayra Morales, 4000 Hollywood Blvd. Suite 501-S, Hollywood, FL 33021 on this 3 day of December 2009.

LAW OFFICES OF ANIDJAR & LEVINE, P.A.

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By: _____

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