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W82/74-010

IN THE CIRCUIT COURT OF THE 15<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR  
PALM BEACH COUNTY, FLORIDA

CASE NO.: 502016CA014473XXXXMB  
Division: AE

JOHN LEOPOLDO FIORILLA  
as trustee f/b/o JOHN LEOPOLDO  
FIORILLA TRUST U/A/D 06-25-2003,

Plaintiff,

vs.

KLAYMAN & TOSKES, P.A., a Florida  
Corporation; LAWRENCE L. KLAYMAN;  
and STEVEN D. TOSKES,

Defendants.

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**DEFENDANTS' MOTION FOR EXTENSION OF TIME  
TO RESPOND AND OBJECT TO PLAINTIFF'S  
FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION**

Defendants, KLAYMAN & TOSKES, P.A., LAWRENCE L. KLAYMAN and STEVEN D. TOSKES, ("Defendants") file this Motion for Extension of Time to Respond and Object to Plaintiff's First Set of Interrogatories and First Request for Production, and state as follows:

1. On or about January 3, 2017, Plaintiff served the Complaint along with Plaintiff's First Request for Production and First Set of Interrogatories upon Defendants LAWRENCE L. KLAYMAN and KLAYMAN & TOSKES, P.A. On January 17, 2017, undersigned counsel accepted service of the Complaint and first set of discovery on behalf of Defendant, STEVEN D. TOSKES.

2. Defendants LAWRENCE L. KLAYMAN and KLAYMAN & TOSKES, P.A.'S response to the First Request for Production and First Set of Interrogatories is due today.

3. Defendants require additional time to frame their response to the First Request for Production and First Set of Interrogatories, and as such, respectfully request enlargement of time

to respond and otherwise object where applicable.

4. This extension of time is sought in good faith and not for the purposes of delay and no party will be prejudiced by it.

5. In an abundance of caution, Defendants are filing Objections to Plaintiff's First Request for Production and First Set of Interrogatories. However, service of the Objections should not be construed to waive any objections which may be available to any other Request for Production or Interrogatory not expressly referenced therein. Defendants specifically reserve their right to all other available objections.

WHEREFORE, Defendants, KLAYMAN & TOSKES, P.A., LAWRENCE L. KLAYMAN and STEVEN D. TOSKES, respectfully request this Court enter an Order granting Defendants an extension of time to serve respond and object to Plaintiff's First Set of Interrogatories and First Request for Production.

WE HEREBY CERTIFY that on this 17th day of **February, 2017**, I electronically filed the foregoing with the Clerk of the Court by using the Florida Court's E-Filing Portal which will send a notice of electronic filing to all counsel on the attached Service List.

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