UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 20-cv-25176-BLOOM/Otazo-Reyes

ODETTE BLANCO DE FERNANDEZ *née*
BLANCO ROSELL,

Plaintiff,
v.

SEABOARD MARINE, LTD.,

Defendant.
_____/

DEFENDANT SEABOARD MARINE, LTD.'S AGREED MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

Defendant Seaboard Marine, Ltd. ("Seaboard Marine") hereby moves pursuant to Fed. R. Civ. P. 6(b)(1) for a 30-day enlargement of time—up to and including February 18, 2021—to respond to Plaintiff's Complaint. Plaintiff does not oppose the relief requested. In support of this agreed Motion, Seaboard Marine states as follows:

1. On December 20, 2020, Plaintiff commenced this action against Seaboard Marine by filing the Complaint in the United States District Court for the Southern District of Florida. (ECF No. 1.) Plaintiff served the Complaint on Seaboard Marine on December 28, 2020. (ECF No. 25.)

2. Currently, pursuant to Fed. R. Civ. P. 12(a)(1), Seaboard Marine must answer, move against, or otherwise respond to Plaintiff's Complaint by January 19, 2021. Seaboard Marine requests a 30-day enlargement of time—up to and including February 18, 2021—to respond to Plaintiff's Complaint.

3. Pursuant to Fed. R. Civ. P. 6(b)(1), good cause exists for this relief. Seaboard Marine recently retained counsel for this action, and both Seaboard Marine and its counsel are assessing Plaintiff's allegations and legal theories. A short extension of time is needed so that Seaboard Marine and its counsel have sufficient opportunity to properly review, investigate, analyze, and evaluate the allegations and legal claims of Plaintiff before responding to the Complaint.

4. Furthermore, this request will not prejudice any party because it is Seaboard Marine first request for any enlargement of time and Plaintiff's counsel has agreed to this extension.

WHEREFORE, Seaboard Marine respectfully requests that the Court grant its agreed to Motion and enter the attached Order that gives Seaboard Marine up to and including February 18, 2021, to respond to Plaintiff's Complaint.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

Counsel for Seaboard Marine has conferred with Plaintiff's counsel about the requested enlargement of time in accordance with Local Rule 7.1(a)(3), and Plaintiff's counsel does not oppose and has agreed to the relief requested.

Dated: January 14, 2021

Respectfully submitted,

s/Robert M. Brochin

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[PROPOSED] ORDER GRANTING DEFENDANT'S *AGREED* MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

THIS CAUSE is before the Court upon Defendant's *Agreed* Motion for Extension of Time to Respond to Plaintiff's Complaint ("Motion"). Upon due consideration, it is ORDERED and ADJUDGED that:

The Motion is **GRANTED**. Defendant shall have up to and including February 18, 2021, to respond to Plaintiff's Complaint.

DONE and ORDERED in Chambers at Miami, Florida, this _____ day of January 2021.

_____
BETH BLOOM
UNITED STATES DISTRICT JUDGE

Copies to:
Counsel of record