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.
_____/

JOINT MOTION FOR ENLARGEMENT OF TIME TO FILE JOINT SCHEDULING REPORT

Plaintiff Odette Blanco De Fernandez *née* Blanco Rosell ("Plaintiff") and Defendant Seaboard Marine, Ltd. ("Seaboard Marine"), through undersigned counsel and pursuant to Fed. R. Civ. P. 6(b)(1), file this joint motion requesting a seven-day enlargement of time—up to and including February 11, 2021—for the parties to file their joint scheduling report. In support of this agreed Motion, the parties state as follows:

1. Plaintiff commenced this action against Seaboard Marine on December 20, 2020. (ECF No. 1.)

2. On December 21, 2020, the Court ordered the parties to prepare and file a joint scheduling report within twenty-one days of an appearance by a Defendant in this case. (ECF No. 6.) The Court further ordered that the parties file certificates of interested parties and corporate disclosure statements at the time of filing the joint scheduling report. (*Id.*)

3. On January 14, 2021, Seaboard Marine appeared through counsel. (ECF Nos. 27–29.)

4. Thus, the parties' deadline to file their joint scheduling report, along with certificates of interested parties and corporate disclosure statements, is February 4, 2021.

5. Good cause exists for a seven-day extension of the deadline. The parties are engaged in continuing discussions regarding scheduling. In addition, counsel for Plaintiff has a medical issue that necessitates a brief enlargement of time to confer and submit the required scheduling report.

6. This joint request will not prejudice any party and is made in good faith and not for the purpose of delay.

WHEREFORE, the parties respectfully request that the Court grant their joint Motion and enlarge the parties' deadline to file their joint scheduling report, certificates of interested parties, and corporate disclosure statements, until February 11, 2021.

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

Counsel for Seaboard Marine and Plaintiff's counsel have conferred about the requested enlargement of time in accordance with Local Rule 7.1(a)(3), and both parties jointly seek the requested relief.

Dated: February 2, 2021

s/ David J. Horr David J. Horr Florida Bar. No. 310761 dhorr@admiral-law.com William R. Boeringer Florida Bar No. 347191 wboeringer@admiral-law.com William B. Milliken Florida Bar No. 143193 wmilliken@admiral-law.com Horr, Novak & Skipp, P.A. Two Datran Center, Suite 1700 9130 S. Dadeland Boulevard Miami, Florida 33156 Telephone: (305) 670-2525 Facsimile: (305) 670-2526 David A. Baron (admitted *pro hac vice*) dbaron@bcr-dc.com Melvin White (admitted *pro hac vice*) mwhite@bcr-dc.com Laina C. Lopez (admitted *pro hac vice*) lcl@bcr-dc.com Berliner Corcoran & Rowe LLP 1101 17th Street, N.W., Suite 1100 Washington, D.C. 20036-4798 Tel: (202) 293-5555 Facsimile: (202) 293-9035 FIELDS PLLC Richard W. Fields (admitted *pro hac vice*) fields@fieldslawpllc.com Martin Cunniff (admitted *pro hac vice*) MartinCunniff@fieldslawpllc.com 1701 Pennsylvania Ave, N.W., Suite 200 Washington, D.C. 20006 Tel: (833) 382-9816	*s/ Robert M. Brochin* Robert M. Brochin Florida Bar No. 0319661 bobby.brochin@morganlewis.com Matthew Papkin Florida Bar No. 106565 matthew.papkin@morganlewis.com Sarah J. Cohen Florida Bar No. 1010683 sarah.cohen@morganlewis.com Morgan, Lewis & Bockius LLP 200 South Biscayne Boulevard Suite 5300 Miami, Florida 33131-2339 Telephone: 305.415.3000 Facsimile: 305.415.3001 Carl A. Valenstein (admitted *pro hac vice*) carl.valenstein@morganlewis.com One Federal Street Boston, MA 02110 Telephone: 617.341.7700 Facsimile: 617.341.7701
Counsel for Plaintiffs	*Counsel for Defendant Seaboard Marine, Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of February, 2021, the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ Robert M. Brochin
Robert M. Brochin

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[PROPOSED] ORDER GRANTING JOINT MOTION FOR
ENLARGEMENT OF TIME TO FILE JOINT SCHEDULING REPORT

THIS CAUSE is before the Court upon the parties' Joint Motion for Enlargement of Time to File Joint Scheduling Report ("Motion"). Upon due consideration, it is ORDERED and ADJUDGED that:

The Motion is **GRANTED**. The parties shall have up to and including February 11, 2021, to file their joint scheduling report, certificates of interested parties, and corporate disclosure statements.

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

_____
BETH BLOOM
UNITED STATES DISTRICT JUDGE

Copies to:

Counsel of record