UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Case No.: 1:19-cv-21725-JLK

JAVIER GARCIA-BENGOCHEA,

Plaintiff,

vs.

CARNIVAL CORPORATION, d/b/a
Carnival Cruise Lines, a foreign corporation,

Defendant.
_____/

JOINT MOTION FOR ENLARGEMENT
OF TIME TO FILE RESPONSE AND REPLY TO
MOTION FOR JUDGMENT ON THE PLEADINGS

Plaintiff Javier Garcia-Bengochea ("Plaintiff") and Defendant Carnival Corporation ("Carnival"), through their respective undersigned counsel and pursuant to Fed. R. Civ. P. 6, move jointly for an enlargement of time, to file response and reply briefs to the motion for judgment on the pleadings (the "Motion," ECF No. 54) filed by Carnival as follows:

1. Carnival filed its Motion on November 15, 2019. Thus, Plaintiff's response date is presently December 2, 2019, as the Court is closed on November 29 for the Thanksgiving Holiday.

2. Plaintiff anticipates that responding to Carnival's motion will require travel to Costa Rica.

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3. Plaintiff anticipates that he can accomplish this by December 16, 2019, and respectfully requests an enlargement of its deadline to respond to the Motion until that date.

4. Carnival does not oppose Plaintiff's request and, due to the December holidays, seeks a reciprocal enlargement of its deadline to file a reply brief in support of its Motion until January 6, 2020.

5. The requested extension of time is filed jointly by the parties, and is made in good faith and not for the purposes of delay.

CONCLUSION

For the foregoing reasons, the parties jointly request that the Court enlarge the deadline for Plaintiff to respond to the Motion until December 16, 2019, and for Carnival to file its reply brief in support of the Motion until January 6, 2020.

DATED: November 26, 2019.

Respectfully submitted,

HAVANA DOCKS CORPORATION

By its Attorneys,

s/Roberto Martínez

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CARNIVAL CORPORATION

By its Attorneys,

/s/Stuart H. Singer

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Attorneys for Defendant

NOTICE OF ENDORSEMENT

Pursuant to the CM/ECF Administrative Procedure 3J(3), the undersigned hereby certifies that counsel for the Defendant has authorized me to file this Joint motion for enlargement of time on its behalf with the electronic signature of its counsel affixed hereto.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Clerk of the Court. I also certify that the foregoing document is being served this 26th day of November, 2019, on all counsel of record or pro se parties either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Roberto Martínez
Roberto Martínez

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Case No.: 1:19-cv-21725-JLK

JAVIER GARCIA-BENGOCHEA,

Plaintiff,

vs.

CARNIVAL CORPORATION d/b/a/
CARNIVAL CRUISE LINES,

Defendant.

_____/

ORDER GRANTING THE PARTIES' JOINT MOTION FOR EXTENSION OF TIME TO RESPOND AND REPLY TO MOTION FOR JUDGMENT ON THE PLEADINGS

This matter came before the Court upon the Parties' Joint Motion for Enlargement of Time to File Response and Reply to Motion for Judgment on the Pleadings. (the "Motion," ECF No. __.) Having reviewed the Motion, and being otherwise fully advised in the premises, it is:

ORDERED and **ADJUDGED** that the Parties' Joint Motion for Enlargement of Time to File Response and Reply to Motion for Judgment on the Pleadings is **GRANTED**. Plaintiff's Response to Carnival's Motion for Judgment on the Pleadings is now **December 16, 2019**. Carnival's deadline to file a Reply in support of its Motion for Judgment on the Pleadings is now **January 6, 2020.**

DONE AND ORDERED in Chambers at Miami-Dade County, Florida, on this ___ day of November, 2019.

_____
HONORABLE JAMES LAWRENCE KING
SENIOR UNITED STATES DISTRICT JUDGE