UNITED STATES DISRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

ODETTE BLANCO DE FERNANDEZ *née* BLANCO ROSELL, *Plaintiff*, v. CROWLEY MARITIME CORPORATION, *Defendant*.	Case No. 3:20-cv-01426-BJD-PDB

DEFENDANT'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO COMPLAINT

Defendant, Crowley Maritime Corporation ("Defendant" or "Crowley"), moves for an enlargement of time to respond to Plaintiff's Complaint until February 26, 2021. Plaintiff consents to the relief sought herein. In support of its Motion, Defendant states:

1. On December 29, 2020, Crowley was served with the summons and a copy of the Complaint in this action. Accordingly, Crowley's response to the Complaint is due on January 19, 2021.

2. There is good cause for Crowley's request for an extension. Defendant's counsel was recently retained to represent Crowley in this matter and has numerous pre-existing commitments throughout the month of January and the beginning of February, which would impede Defendant's counsel's ability to adequately prepare a response to the Complaint. Moreover, Crowley believes that Plaintiff has sued the wrong entity and is working with Plaintiff to name the correct party.

3. This is the first request for an extension of time to respond to Plaintiff's Complaint.

4. **Local Rule 3.01(g) Certification**. Pursuant to Local Rule 3.01(g), counsel for Crowley certifies that he conferred with Plaintiff's counsel who consents to the relief sought herein.

WHEREFORE, Defendant respectfully requests that this Court enter an order granting Defendant an extension, until Friday, February 26, 2021, to file and serve its response to the Complaint.

DEFENDANT'S MEMORANDUM OF LAW IN SUPPORT OF ITS UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO COMPLAINT

Rule 6(b) of the Federal Rules of Civil Procedure provides that:

> When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

Fed. R. Civ. P. 6(b). Accordingly, granting Crowley's motion for enlargement of time would constitute a proper use of this Court's discretion. As Rule 6(b)(A) contemplates, Crowley is requesting the enlargement of time prior to its original deadline to respond to the Complaint. *Id.* Moreover, good cause exists for the relief sought in Crowley's motion, which would allow Defendant's counsel adequate time to prepare a response to the Complaint and allow the parties to work together to determine the correct defendant entity. Finally, Plaintiff will not be prejudiced by the enlargement of time, and it consents to that relief.

For the foregoing reasons, Crowley respectfully requests that the Court enter an order extending Crowley's deadline to file and serve its response to the Complaint until February 26, 2021.

DATED: January 13, 2021

Respectfully submitted,

/s/ *J. Douglas Baldridge*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 13, 2021, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/*J. Douglas Baldridge*
J. Douglas Baldridge