

IN THE CIRCUIT COURT OF THE 20th  
JUDICIAL CIRCUIT IN AND FOR  
COLLIER COUNTY, FLORIDA

Case No. 11-2020-CA-002432-0001

STANLEY WALKIEWICZ,

Plaintiff,

vs.

MASON CLASSICAL ACADEMY, INC.,  
A Florida not for profit corporation,

Defendant.

---

**DEFENDANT'S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant, MASON CLASSICAL ACADEMY, INC. ("MCA"), by and through its undersigned counsel, hereby files its Motion for Extension of Time to Respond to Plaintiff STANLEY WALKIEWICZ ("Walkiewicz") Complaint, and in support states as follows:

1. MCA was served with initial process on Sept. 1, and the undersigned counsel was recently retained to represent and defend MCA.
2. The undersigned counsel has not yet had an opportunity to meet and confer with his client or to obtain and review the relevant documents, all of which is necessary in order to prepare a response to the Complaint.
3. As such, Defendant requests a 20 day extension of time to file its Response to the Complaint, with a new response date of October 12, 2020.
4. Plaintiff's counsel, Benjamin Yormak, Esq., has been contacted and Plaintiff has no opposition to this request..

5. This motion is not made for purposes of delay, and it is in the best interests of justice.

WHEREFORE, Defendant, MASON CLASSICAL ACADEMY, INC., respectfully requests that this Court enter an order extending the deadline to file a response to the Plaintiff's Complaint for an additional 20 days, with a new response date of October 12, 2020, along with such other and further relief as this Court deems just and proper.

MARSHALL, DENNEHEY,  
WARNER, COLEMAN & GOGGIN  
Counsel for Defendant Mason Classical  
Academy, Inc.  
100 N.E. Third Avenue  
11<sup>th</sup> Floor  
Ft. Lauderdale, FL 33301  
(954) 847-4920  
(954) 627-6640 (facsimile)

By: /s/ Jonathan E. Kanov  
JONATHAN E. KANOV  
Florida Bar No. 91413  
jekanov@mdwgcg.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via E-Portal this 18th day of September, 2020, to Benjamin H. Yormak, Esq., Yormak Employment & Disability Law, 9990 Coconut Road, Bonita Springs, FL 34135 (byormak@yormaklaw.com).

By: s/ Jonathan E. Kanov