

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

NEELAM TANEJA PERRY

PLAINTIFF,
VS.

CASE NO. 24- 003892- CI

ROBERT ROCKY ROCHFORD

DEFENDANT(S) /

MOTION FOR EXTENSION OF TIME

COMES NOW, Defendant, ROBERT ROCHFORD (" Defendant"), by and through undersigned counsel, pursuant to the Florida Rules of Civil Procedure, and files this Motion for Extension of Time to Respond to Plaintiff's Complaint in the above-styled action, and in support thereof state as follows:

1. Plaintiff, NEELAM TANEJA PERRY ("Plaintiff") instituted this action for emergency injunction and complaint to contest to primary election results of August 20, 2024 based on misconduct, fraud, corruption.
2. Defendant has recently retained the undersigned counsel.
3. The undersigned counsel is now seeking a brief extension, to be afforded time to review the file and Plaintiff's allegations before filing a response to Plaintiff's Complaint.
4. This motion is not brought for the purposes of delay, and no parties will be prejudiced by the granting of such extension.

WHEREFORE, Defendant, respectfully request that this Court grant a brief extension of time to file a substantive response to the Plaintiff's Complaint, award Defendant attorney's fees to the extent Defendant prevails in this action and grant such other relief that the Court deems just and appropriate under the circumstances.

IVANOV & WOLF, PLLC
Attorney for Defendant
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By: /s/ Matthew D. Wolf
MATTHEW D. WOLF, FBN: 92611

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing instrument has been furnished by electronic mail (e-mail) and/or U.S. Mail as listed in the below service list, on served on this September 6, 2024 to the following:

PERRY, NEELAM TANEJA ALSO *KNOWN AS* TANEJA, NEELAM

2850 34TH ST N
#1
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COFFEY, AMANDA

315 COURT STREET
CLEARWATER, FL 33756

JOARDER, EHSAN

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MARCUS, JULIE

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ROCHFORD, ROBERT ROCKY

9712 MONAGHAN STREET
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By: /s/ Matthew D. Wolf

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