

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

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

**CASE NO: 24-003939-CI
522024CA003939XXCICI**

JULIE MARCUS, et. al.,

Defendants.

_____ /

**DEFENDANT WHITNEY FOX'S MOTION FOR EXTENSION OF
TIME TO RESPOND TO COMPLAINT AND
INCORPORATED MEMORANDUM OF LAW**

COMES NOW, Defendant Whitney Fox ("Defendant") by and through the undersigned counsel, and moves pursuant to the Florida Rule of Civil Procedure for an extension of time until October 18, 2024 to file a response to the Complaint in this matter. In support Defendant states as follows:

1. Defendant was served with the Amended Complaint in this matter on or about September 13, 2024.
2. Undersigned counsel was just retained in this matter and requires additional time to respond to the complaint.
3. Under the Florida Rules of Civil Procedure, the court may for good cause, extend the time for a party to respond to a complaint.
4. Defendant has a good faith belief that this complaint should be dismissed. In order to present the arguments supporting the dismissal Defendant requests until October 18, 2024 to file a response.

5. Good cause exists for the granting of the relief requested herein as the interests of justice will be served if this matter can be resolved in a quick and effective manner.

6. No party will be unfairly prejudiced by the granting of this brief extension.

Therefore, Defendant hereby requests leave to file a Motion to Dismiss or other appropriate pleading by October 18, 2024.

STATEMENT REGARDING CONFERRAL

Undersigned counsel conferred with *pro se* Plaintiff regarding the requested extension of time and during a telephone call on September 30, 2024, *pro se* Plaintiff stated that he was not ready to state a position on the request for additional time.

Respectfully submitted,

/s/Ryan D. Barack

Ryan D. Barack

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a copy of the foregoing has been furnished via the Court's E-Filing Portal on September 30, 2024 to all counsel of record with a copy served via Email and U.S.

Mail to:

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/s/ Ryan D. Barack
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