

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT,
IN AND FOR SEMINOLE COUNTY, FLORIDA

CASE NO. 2019-CA-002063

U.S. BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR CITIGROUP
MORTGAGE LOAN TRUST INC.
MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2007-AR1,

Plaintiff,

v.

TITANS GROUP (A TEXAS JOINT-
STOCK COMPANY) OF SEMINOLE
COUNTY, FL LINA M. OLARTE-
LAVINE A/K/A LINA LAVINE; PNC
BANK N.A. SUCCESSOR BY MERGER
TO RBC BANK (USA); SANDY LANE
RESERVE HOMEOWNERS
ASSOCIATIONS, INC., et al.,

Defendants.

MOTION FOR ENLARGEMENT OF TIME

The Defendant, LINA LEVINE, by and through her undersigned attorney, hereby moves this Court for an Enlargement of Time to file its amended Affirmative Defenses, as follows:

1. On February 16, 2022, a hearing was held on the Plaintiff's Motion to Strike Affirmative Defenses.
2. On May 2, 2022, this Court entered an order providing the Defendant 20 days to amend affirmative defenses 4 and 7.
3. There is currently a hearing set regarding the Plaintiff's Motion to Strike some of the remaining defenses pled by the Defendant.

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4. In the interest of avoiding multiple stages of amending the defenses, the Defendant brings this Motion for Enlargement of Time seeking an extension for leave to amend.

5. As it is possible, that more defenses will need to be amended at the conclusion of the second hearing on the Motion to Strike Affirmative Defenses, the Defendant is seeking an extension to have the affirmative defenses 4 and 7 be addressed with the remaining defenses at the conclusion of the upcoming hearing.

6. By granting this extension, it will serve to streamline judicial economy and avoid having multiple stages of amended defenses.

7. Additionally, it will not cause any undue prejudice as it will permit the Plaintiff to address the defenses once, instead of multiple times as it would currently require.

8. This Motion is not being made for improper delay or for any other improper purpose; rather this Motion is being made in an effort to limit the number of filings in the action.

WHEREFORE, the Defendant requests an enlargement of time to amend affirmative defenses 4 and 7 and any other relief this Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been emailed this 23rd day of May 2022 to VANNESSA SLOAT-ROGERS, ESQUIRE, mail@rasflaw.com; vrogers@rasflaw.com; Robertson, Anschutz & Schneid, P.L. Attorney for the Plaintiff, 6409 Congress Ave., Suite 100, Boca Raton, FL 33487.

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/s/ TIMOTHY QUIÑONES
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