

FLAGLER COUNTY,

Plaintiff,

v.

AJMAL M. ZULALI and ZUBAIR M.
ZULALI and 2251 S OLD DIXIE HWY LLC,

Defendants.

IN THE CIRCUIT COURT OF THE 7th
JUDICIAL CIRCUIT, IN AND FOR
FLAGLER COUNTY, FLORIDA

CASE NO.: 2021 CA 000109

DIVISION: Christopher A. France

**DEFENDANT'S MOTION FOR EXTENSION OF TIME
TO COMPLETE FACT INFORMATION SHEET (form 1.977)**

Defendant, 2251 S OLD DIXIE HWY LLC, ("Defendant"), by and through the undersigned counsel and pursuant to applicable rules, hereby file this *Motion for Extension of Time to Complete Fact Information Sheet (form 1.977)*, ("Motion"), and in support thereof further states as follows:

1. Pursuant to this Court's September 3, 2024 Order for Discovery in Aid of Execution, (DE 89), Defendant is required to complete a Fact Information Sheet, (form 1.977), on or before October 18, 2024.
2. The undersigned has been unable to adequately consult with his client due to the numerous Jewish holidays during the month of October, the level of detail and complexity of the issues herein, and the other obligations of his practice.
3. Defendant requests an additional fourteen (14) days to complete the Fact Information Sheet (form 1.977).
4. This request for an extension is made in good faith and not for purposes of delay.
5. Plaintiff shall not suffer any prejudice if the Court grants this Motion.
6. The undersigned's office contacted Plaintiff's counsel's office regarding the relief requested herein. Plaintiff opposes this Motion.

WHEREFORE, Defendant, 2251 S OLD DIXIE HWY LLC, respectfully requests a brief, fourteen (14) day extension of time, to complete the Fact Information Sheet (form 1.977), along with such other and further relief as the Court deems just and proper.

Respectfully submitted,

THE D'APUZZO LAW FIRM

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By: /s/ T. D'Apuzzo

Theodore D'Apuzzo, Esq.

Florida Bar No.: 0073018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to via: e-mail to Abraham C. McKinnon, Esq. and Noah C. McKinnon, Jr., Esq. at lynn@mckinnonandmckinnopa.com, amckinnon@mckinnonandmckinnonpa.com to Albert J. Hadeed, Esq. and Sean S. Moylan, Esq. at ahadeed@flaglercounty.org, smoylan@flaglercounty.org and via U.S. Mail to Zubair M. Zulali and Ajmal M. Zulali at 10780 Foxwood Road, San Diego, CA 92126, on this 18th day of October, 2024.

By: /s/ T. D'Apuzzo

Theodore D'Apuzzo, Esq.