

**IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA
CIVIL DIVISION**

DANIEL J. STERMER, as receiver of the
Heron Pond Condominium Assoc., Inc.,

CASE NO, CACE-24-015112

Plaintiff,

v.

HERON POND CONDOMINIUM ASSOC., INC.,
And all unit owners listed on Exhibit "C" and other
Interest parties listed on Exhibit "D" to the Complaint

Defendants.

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

Defendant, Freedom Mortgage Corporation ("Defendant" or "Freedom"), by and through its undersigned counsel, and pursuant to the Florida Rules of Civil Procedure, moves the Court for an extension of time, up to and including January 15, 2025, to respond to Plaintiff's Complaint, and in support thereof states as follows:

1. On or about October 18, 2024, Plaintiff filed the Complaint.
2. Freedom's deadline to respond to the Complaint is December 16, 2024.
3. Counsel for Defendant seeks an extension, up to and including January 15, 2025 to respond to the Complaint.
4. The instant motion is not intended to cause undue delay, and no party will be prejudiced by the relief requested herein.

WHEREFORE, Defendant, Freedom Mortgage Corporation, requests that the Court: (1) extend the deadline for Defendant, and (2) grant such further relief as the Court deems just and proper.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on December 16, 2024, a true and correct copy of the foregoing has been filed with the Florida Courts E-Filing Portal which will furnish copies to all counsel of record.

/s/ Yesica S. Liposky
Florida Bar No. 119924
DINSMORE & SHOHL LLP
201 North Franklin Street, Suite 3050,
Tampa, FL 33602
Phone: (813) 543-9848
Primary: yesica.liposky@dinsmore.com
Secondary: kim.novak@dinsmore.com
Secondary: eileen.garvey@dinsmore.com
Counsel for Defendant