

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

DANIEL J. STERMER AS RECEIVER
OF THE HERON POND CONDOMINIUM
ASSOCIATION, INC.,

Case No. CACE-24-015112

Plaintiff,

v.

HERON POND CONDOMINIUM
ASSOCIATION, INC., AND ALL UNIT
OWNERS LISTED ON EXHIBIT "C" AND
OTHER INTERESTED PARTIES LISTED ON
EXHIBIT "D" TO THE COMPLAINT,

Defendant(s).

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF'S
COMPLAINT**

Defendant Mortgage Electronic Registration Systems, Inc. ("MERS"), as Mortgagee, as Nominee for Countrywide Mortgage Ventures, LLC DBA LendingLink, its Successors and Assigns, moves this Court for an Order extending the time in which Defendant has to respond to Plaintiff's Complaint up to and including February 3, 2025.

1. Plaintiff filed its Complaint on October 18, 2024.
2. Defendant was served with the Complaint on November 25, 2024.
3. Defendant's current deadline to answer or otherwise respond to the Complaint was December 16, 2024.
4. Defendant is in the process of investigating Plaintiff's claims and requests a 30-day extension to respond to Plaintiff's Complaint.
5. This request does not prejudice Plaintiff and is not done for the purpose of delay.

WHEREFORE, MERS respectfully request that the Court enter an Order providing Defendant with an extension of time up to and including February 3, 2025, to file a response to Plaintiff's Complaint.

**TROUTMAN PEPPER HAMILTON
SANDERS LLP**

Dated: January 7, 2025

By: /s/ Anthony Calenzo, Esq.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 7, 2025, a true and correct copy was served by E-service on: **Brian G. Rich, Esq.**, Berger Singerman LLP, 201 East Las Olas Blvd., Suite 1500, Fort Lauderdale, FL 33301, brich@bergersingerman.com; jwertman@bergersingerman.com; mnils@bergersingerman.com; and **Alejandro "Alex" Alonso II, Esq.**, Eisinger Law, 4000 Hollywood Blvd., Suite 265 South, Hollywood, FL 3302, eisingerlitigation@gmail.com; astivelman@eisingerlaw.com; aalonso@eisingerlaw.com; krodriguez@eisingerlaw.com.

/s/ Anthony Calenzo, Esq.
Attorney