

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION**

STATE OF FLORIDA,
OFFICE OF FINANCIAL REGULATION

Plaintiff,

vs.

CASE NO: 50-2021-CA-008718-XXXX-MB

NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ, *et al.*,

Defendants.

**RELIEF DEFENDANT SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC'S
UNOPPOSED MOTION TO ENLARGE TIME TO FILE RESPONSIVE PLEADING**

Relief Defendant SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC (“Relief Defendant” or “SHPC”), by and through undersigned counsel, respectfully submits this Unopposed Motion to Enlarge Time to File Responsive Pleading to the Complaint filed by Plaintiff State of Florida, Office of Financial Regulation (“Plaintiff” or “OFR”) in the above-styled matter, and states the following:

1. On October 28, 2021, Plaintiff served an amended complaint in this action, naming SHPC as a Relief Defendant.
2. Undersigned counsel was recently retained to represent Relief Defendant SHPC in this matter.
3. On November 4, 2021, OFR agreed to an extension of time for Relief Defendant SHPC to file a responsive pleading to the complaint up to and including January 4, 2022.

4. By filing this unopposed Motion, the parties agree that Relief Defendant SHPC does not waive any of its defenses.

WHEREFORE, Relief Defendant SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC, respectfully requests this Court grant its Unopposed Motion to Enlarge Time to File Responsive Pleading and enter the Proposed Agreed Order on this Motion, which was submitted through the Online Scheduling and Services System, as required under the AE Divisional Instructions.

Dated: November 12, 2021
Miami, Florida

Respectfully submitted,

KOBRE & KIM LLP

/s/ VICTORIA R. MORRIS

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Counsel for Relief Defendant SHPC, LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2021, a true and correct copy of the foregoing was filed electronically via the Court's electronic filing system that will serve a copy upon all counsel of record.

By: /s/ VICTORIA R. MORRIS

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