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IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Complainant,

v.

MARIA ELENA PÉREZ,

Respondent.
_____/

Supreme Court Case
No. SC14-733

The Florida Bar File
Nos. 2013-70,658 (11K), 2013-70,671 (11K) and 2013-70,691 (11K)

RECEIVED, 01/29/2016 09:58:41 AM, Clerk, Supreme Court

MOTION TO EXTEND TIME

The Respondent, MARIA ELENA PÉREZ, P.A., Respondent, by and through her undersigned attorney, files this Motion to Extend Time and as grounds therefore states:

1. On January 28, 2016 a hearing was held on the Respondent's Motion to Continue the February 1, 2015, final hearing. The grounds for the requested continuance, which was unopposed by The Florida Bar, included a family medical issue for the undersigned's father that necessitated travel from the South Florida area for several days and the necessity of further discovery to be completed.

2. The Referee has rescheduled the final hearing for Monday April 18, 2016, with several days being reserved for such trial.

3. The current deadline for submission of a Report of Referee is March

11, 2016. It is respectfully requested that this Honorable Court afford the Referee an additional sixty (60) days beyond April 18, 2016, to submit the Referee's Report in this matter.

4. This motion is filed in good faith and is not being lodged for dilatory purposes.

5. This motion is submitted at the direction of the Referee. Further, the undersigned counsel has conferred with Bar Counsel, Mr. Thomas A. Kroeger, who does not object to the filing of the instant motion.

WHEREFORE, the Respondent, MARIA ELENA PÉREZ, respectfully requests this Honorable Court to grant the instant motion and likewise extend the deadline for the submission of the Referee's Report through June 20, 2016.

Respectfully submitted,

RICHARDSON & TYNAN, P.L.C.
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By: _____
KEVIN P. TYNAN, ESQ.
TFB No. 710822

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true copy of the foregoing has been furnished by electronic mail only to: Thomas S. Kroeger, Esquire, Bar Counsel, at (tkroeger@flabar.org; amatos@flabar.org) The Florida Bar, 444 Brickell Avenue, Suite M100, Miami, Florida 33131-2408, and to Adria E. Quintela, Staff Counsel, The Florida Bar, 1300 Concord Terrace, Suite 130, Sunrise, FL 33323 (aquintel@flabar.org) on this 24 day of January, 2016.

By: _____
KEVIN P. TYNAN, ESQ.