

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
KEY WEST DIVISION

IN ADMIRALTY

CASE NO: 4:17-cv-10050

IN THE MATTER OF
THE COMPLAINT OF HORIZON DIVE
ADVENTURES, INC., AS OWNER OF
THE M/V PISCES (Hull ID# FVL31002F707)
ITS ENGINES, TACKLE, APPURTENANCES,
EQUIPMENT, ETC., IN A CAUSE FOR
EXONERATION FROM OR LIMITATION OF
LIABILITY,

Petitioner,

vs.

PETER SOTIS,
SANDRA STEWART, AS PERSONAL
REPRESENTATIVE OF THE ESTATE
OF ROBERT STEWART,

Respondents/Claimants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
CLAIMANT'S RENEWED MOTION TO STAY LIMITATION ACTION**

Respondent/Claimant, PETER SOTIS, by and through his undersigned counsel files this, his Unopposed Motion for Extension of Time to file his Response to *Claimant's Renewed Motion to Stay Limitation Action* [D.E. 127], and as grounds therefore would show unto this Court:

1. On December 11, 2018 Respondent/Claimant, SANDRA STEWART, filed *Claimant's Renewed Motion to Stay Limitation Action* [D.E. 127].
2. A Response to said Motion is currently due on or before December 26, 2018.

3. On Thanksgiving morning, the undersigned counsel was involved in a bicycle accident that resulted in nine hours of neurosurgery involving a fusion of the cervical spine from C1 to C4 with four titanium rods and various screws and plates.

4. The undersigned was readmitted to the hospital post discharge for surgical complications and while now fortunately healing and progressing, the undersigned remains in a neck immobilizer for the next 8 weeks.

5. However, due to the undersigned's medical status and ongoing treatment, the undersigned counsel does not foresee being able to timely comply with the December 26, 2018 deadline.

6. Accordingly, the undersigned counsel respectfully requests a two-week extension of time to file Respondent/Claimant's, PETER SOTIS, response until the close of business on January 9, 2019.

7. The undersigned counsel has consulted with all other counsel of record who have no objection and have consented to the filing of this Motion.

WHEREFORE, Respondent/Claimant, PETER SOTIS respectfully requests that this Honorable Court enter an Order granting a brief extension of time to file his Response to Claimant's Renewed Motion to Stay Limitation Action until the close of business on January 9, 2019.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, on this 20th day of

December, 2018, and that the foregoing document is being served this day on all counsel of record identified on the attached Service List, via transmission of Notices of Electronic Filing generated by CM/ECF.

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