

IN THE CIRCUIT COURT OF THE 3<sup>rd</sup>  
JUDICIAL CIRCUIT IN AND FOR  
COLUMBIA COUNTY, FLORIDA

CASE NO.: CACE-18-000105-CA

ADD HELIUM, LLC  
a Delaware Limited Liability Corporation  
and PETER SOTIS, individually,

Plaintiffs,

vs.

INTERNATIONAL ASSOCIATION OF NITROX  
DIVERS, INC.,  
a Florida Corporation,

Defendants.

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**MOTION FOR EXTENSION OF TIME TO REMIT PAYMENT OF  
ATTORNEY'S FEES AND SANCTIONS**

Plaintiffs, ADD HELIUM, LLC and PETER SOTIS, by and through their undersigned counsel, hereby move this Honorable Court for an extension of time to remit payment of sanctions and attorney's fees to the Defendant pursuant to this Court's Order dated May 25, 2019, and in support thereof states as follows:

1. On May 25, 2019, this Court granted the Defendant's request for fees and sanctions in the amount of \$600.00 pursuant to Defendant's Motion for Sanctions and \$1,500.00 pursuant to the Defendant's Motion to Compel.
2. Plaintiffs' legal costs in this action are being funded by foreign insurers as part of Plaintiffs' defense in the ongoing Stewart wrongful death litigation.

3. Plaintiffs' counsel has requested, but not yet received, the \$600.00 pursuant to Defendant's Motion for Sanctions and \$1,500.00 pursuant to the Defendant's Motion to Compel from Plaintiffs' insurers.

4. Plaintiffs' respectfully request an extension of time until and including Friday, July 26, 2019, to remit payment in the total amount of \$2,100.00 to the Defenant.

WHEREFORE, PETER SOTIS and ADD HELIUM respectfully request that this Honorable Court enter an Order granting *Plaintiffs' Motion for Extension of Time to Remit Payment of Attorney's Fees and Sanctions* until and including Friday, July 26, 2019.

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the foregoing document was furnished by e-mail this 15<sup>th</sup> day of July, 2019 to: Jennifer C. Biewend, Esq., Robinson, Kennon & Kendron, P.A., 582 W. Duval Street, Lake City, Florida 32055; Telephone: 386-755-1334; Email: [jcb@rkkattorneys.com](mailto:jcb@rkkattorneys.com).

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By: /s/ Neil Bayer  
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