

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CASE # 2025CA005676

MARCIO SOUSA SALES,
Plaintiff,

-VS-

ANTONIO DE ANDRADE,
Defendant,

**MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE TO COMPLAINT**

COMES NOW defendant ANTONIO DE ANDRADE by and through the undersigned, files this Motion to Extension of Time to file Response to the Complaint filed June 9, 2025, states and argues as follows:

1. Plaintiff's over 110-page complaint seems to allege points that have already been determined in another related cases or simply have no merit. The undersigned needs additional time to prepare the response and a counterclaim- if necessary.

2. While the Complaint alleges claims against Mr. De Andrade, it seems plaintiff to confuse the elements of recognized causes of action and seems to invent new ones and the undersigned cannot delineate the three allegations and determine ed defendant's specific liability and actions.

3. Plaintiff's failure of precision and delineation leaves counsel needing additional time to understand and respond to the complaint.

4. There does not exist any prejudice to the plaintiffs in requesting the extension of time.

WHEREFORE, Anotnio De Andrade requests the Honorable Court to enter an order granting leave to file the response to the Complaint and requiring a response to the complaint in twenty (20) days, and for such other and further relief this Honorable Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been e-served via efiling portal on July 1, 2025 to: Marcio Sousa Sales 221187 Aquila ST, Boca Raton FL 33428 pursuant to Rule 2.516.

Respectfully Submitted,
Morris Shields LeBlanc

/s/ Curtis LeBlanc
CURTIS LeBLANC, Esq.
Florida Bar No. 461581

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