

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 ANSWER PETITIONERS  
COUNTERCLAIM TO THE SECOND AMENDED CLAIM OF PETER SOTIS**

Respondent/Claimant, PETER SOTIS, by and through his undersigned counsel files this, his Unopposed Motion for Extension of Time to file his Answer to Petitioner's Counter Claim to the Second Amended Claim of Peter Sotis [D.E. 69], and as grounds therefore would show unto this Court:

1. On June 22, 2018, Respondent/Claimant, PETER SOTIS, filed his Second Amended Answer and Affirmative Defenses to Complaint, Amended Counterclaim [D.E. 68].

2. On June 26, 2018, Petitioner, HORIZON DIVE ADVENTURES, filed its Objection, Answer, Affirmative Defenses and Counter Claim to the Second Amended Claim of Peter Sotis [D.E. 69].

3. An Answer to said Counterclaim is currently due on or before July 17, 2018.

3. However, due to extensive work in preparation for a trial that commenced on July 16, 2018, the undersigned counsel was not able to timely comply with the July 17, 2018 deadline.

4. This Honorable Court has granted Respondent/Claimant's, SANDRA STEWART, Motion for an Extension of Time to File an Answer to PETER SOTIS's Amended Complaint. [D.E. 72].

5. Accordingly, the undersigned counsel respectfully requests an extension of time to Answer, Petitioner's, HORIZON DIVE ADVENTURES, Counter Claim until the close of business on July 27, 2018.

6. 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 Answer, Petitioner's, HORIZON DIVE ADVENTURES, Counter Claim until the close of business on July 27, 2018.

#### **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 18<sup>th</sup> day of July,

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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