

**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIRCUIT CIVIL**

**MEIBEL SABOYA DIAZ,
PLAINTIFF,**

VS.

Case No: 2023 CA 000499

**SEAWORLD PARKS &
ENTERTAINMENT
LLC D/B/A BUSCH GARDENS,**

DEFENDANT.

MOTION TO ENLARGE TIME TO RESPOND TO DISCOVERY

Comes now Plaintiff, by and through the undersigned counsel, and hereby files this motion to enlarge time to respond to the discovery from Defendant, in accordance with Fla. R. Civ. Pro. 1.090, and states as follows:

1. Florida Rules of Civil Procedure 1.090 permits the court to enlarge time to respond to discovery upon request of a party, for cause shown, or if after the due date, excusable neglect.
2. Defendant served discovery upon Plaintiff, and for the following reason, Plaintiff has been unable to respond to the discovery: Unprecedented changes have been made to the tort law in Florida, and Plaintiff's counsel's office was forced to file more lawsuits over a course of a couple of weeks than ever before in the history of counsel's office (see HB 837).
3. All staff helped, including the litigation manager returning from maternity leave early and filing lawsuits with her baby in her arms.
4. As such, Plaintiff's counsel was physically unable to meet the deadlines in this case.
5. Further, Plaintiff's counsel did send the interrogatories to the Plaintiff to be signed, but counsel has not received the notarized version back from the Plaintiff. As of the date of this

motion, the Interrogatories and Request for production responses are being served to Defendant, just without the interrogatories being notarized.

6. Plaintiff hereby is requesting additional days to respond to the discovery and provide notarized interrogatory page.

WHEREFORE, Plaintiff requests that this Court issue an order enlarging the time for Plaintiff to respond to Defendant's discovery, and any other remedy that this Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document has been furnished on March 31, 2023, by Electronic Mail in accordance with Fla. R. Jud. Admin. 2.516, or in accordance with the relevant applicable Florida Rule of Civil Procedure, to the referenced party at the following designated email service address(es):

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Dated March 31, 2023.

Respectfully Submitted,



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