

IN THE CIRCUIT COURT OF THE
FOURTH JUDICIAL CIRCUIT, IN AND
FOR DUVAL COUNTY, FLORIDA

CASE NO.: 16-2007-CA-003840-XXXX-MA
DIVISION: CV-G

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE FOR THE REGISTERED HOLDERS
OF GSAMP TRUST 2005-SEA1, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2005-SEA1,
Plaintiff,

vs.

MARGARET A MASSEY, ET AL,
Defendants.

FILED
IN COMPUTER
LUZ H.V.

DEFENDANT MARGARET A. MASSEY'S MOTION TO ENLARGE TIME

COMES NOW, Defendant by and through undersigned counsel and requests that this court extend the time allowed for Defendant to file a response to the plaintiff's complaint in the referenced case until June 29, 2007, and states:

1. According to the Plaintiff, this Defendant was served with a Summons and Complaint in the instant action on May 10, 2007.
2. Defendant, through her caseworker at Urban Jacksonville, applied to Jacksonville Area Legal Aid, Inc. for representation in this cause but the undersigned counsel has not had sufficient time to prepare to respond to the Plaintiff's Complaint in order to protect Defendant's rights and interests in this action.
3. For the above reasons, Defendant requests that the Court grant until June 29, 2007, to allow attorney April Carrie Charney adequate time to respond to the Plaintiff's Complaint, as appropriate, on behalf of the Defendant.
4. Plaintiff's attorney has been notified via her assistant and voice mail message concerning this request for an extension of time.

WHEREFORE, Defendant requests that this court enlarge the time for filing her response to the plaintiff's complaint until June 29, 2007.

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of this document has been mailed to Colleen M. Colton, Shapiro & Fishman, 2424 N. Federal Highway, Suite 360, Boca Raton, Florida 33431, Attorney for Plaintiff this 30 day of May 2007.

original
JACKSONVILLE AREA LEGAL AID, INC.

*file date
30 May
x mail on 5/31/07*
APRIL CARRIE CHARNEY, Esquire
Fla. Bar No.: 310425
126 West Adams Street
Jacksonville, Florida 32202
Telephone: (904) 356-8371, ext.373
Facsimile: (904) 224-7050
april.charney@jaxlegalaid.org
Attorney for Defendant