

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

In re:

Laser Spine Institute, LLC	Case No. 2019-CA-2762
CLM Aviation, LLC	Case No. 2019-CA-2764
LSI HoldCo, LLC	Case No. 2019-CA-2765
LSI Management Company, LLC	Case No. 2019-CA-2766
Laser Spine Surgery Center of Arizona, LLC	Case No. 2019-CA-2767
Laser Spine Surgery Center of Cincinnati, LLC	Case No. 2019-CA-2768
Laser Spine Surgery Center of Cleveland, LLC	Case No. 2019-CA-2769
Laser Spine Surgery Center, LLC	Case No. 2019-CA-2770
Laser Spine Surgery Center of Pennsylvania, LLC	Case No. 2019-CA-2771
Laser Spine Surgery Center of St. Louis, LLC	Case No. 2019-CA-2772
Laser Spine Surgery Center of Warwick, LLC	Case No. 2019-CA-2773
Medical Care Management Services, LLC	Case No. 2019-CA-2774
Spine DME Solutions, LLC	Case No. 2019-CA-2775
Total Spine Care, LLC	Case No. 2019-CA-2776
Laser Spine Institute, LLC	Case No. 2019-CA-2777
Laser Spine Surgery Center of Oklahoma, LLC	Case No. 2019-CA-2780

Assignors,

Consolidated Case No. 2019-CA-2762
Division L

To:

Soneet Kapila,

Assignee.

**AGREED MOTION FOR ENLARGEMENT OF TIME TO REPLY TO
TEXAS CAPITAL BANK, N.A. AS ADMINISTRATIVE AGENT TO THE LENDER
GROUP'S RESPONSE TO MOTION TO COMPEL DISCOVERY RESPONSES**

Joe Samuel Bailey, Laserscopic Spinal Centers of America, Inc., Laserscopic Spine Centers of America, Inc., and Laserscopic Medical Clinic, LLC (collectively, the "Judgment Creditors"), by and through their counsel of record, hereby file their Motion for Enlargement of Time to Reply to Texas Capital Bank, N.A. as Administrative Agent to the Lender Group's Response to Motion to Compel Discovery Responses ("Texas Capital Bank, N.A.") and state as follows:

1. Texas Capital Bank, N.A., filed their Response to Judgment Creditors' Motion to Compel on July 30, 2020 [Doc 631].

2. Judgment Creditors' reply is due on August 4, 2020, and hereby request a brief extension of time, up to and including September 3, 2020, to reply to Texas Capital Bank, N.A.'s Response to the Motion to Compel Discovery Responses.

3. Undersigned counsel has conferred with counsel for Texas Capital Bank, N.A., who does not oppose the extension of time.

WHEREFORE, Judgment Creditors respectfully request an enlargement of time up to and including September 3, 2020, to serve its reply to Texas Capital Bank, N.A.'s Response.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 4, 2020, the foregoing was electronically filed with the Florida Courts E-Filing Portal, which will serve it via electronic mail to counsel of record.

Respectfully submitted,

By: /s/ Jennifer G. Altman
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