

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

CASE NO: 502005CA001771XXXMBAE

ELWOOD GARY BAKER,

Plaintiff,

vs.

NITV, LLC,

Defendant,

vs.

NITV FEDERAL SERVICES, LLC,  
LOURDES IRIMIA, JAMES KANE,  
and CHARLES HUMBLE,

Third Party Defendants.

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DEFENDANT AND THIRD PARTY DEFENDANTS' MOTION FOR EXTENSION OF  
DISCOVERY DEADLINE

Defendant, NITV, LLC, and Third Party Defendants, NITV FEDERAL SERVICE, LLC, LOURDES IRIMIA, JAMES KANE, and CHARLES HUMBLE, by and through their undersigned attorney, respectfully move the Court for an extension of the March 2, 2021, discovery deadline and in support thereof state that the extension of the deadline has been discussed with opposing counsel, who has indicated no objection. The extension is necessary to continue to take discovery and one or two additional depositions in preparation for the upcoming trial. Additionally, it was only learned today, February 18, 2021, that Third Party Defendant, CHARLES HUMBLE, was tested positive for CoVid19 and the results reported on February 11, 2021, therefore, his involvement in the case will be limited until he is cleared. The parties would be prejudiced if discovery were cutoff prior to being able to complete same and no prejudice will occur nor should the forward progress of the case be delayed by the granting of the relief sought herein.

WHEREFORE, it is respectfully requested the discovery deadline be extended beyond

the initial March 2, 2021, deadline.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by the Florida Courts E-Filing Portal to Scott W. Zappolo, Esquire, Zappolo & Farwell, P.A., 7108 Fairway Drive, Suite 322, Palm Beach Gardens, Florida 33418 ([szappolo@zappolofarwell.com](mailto:szappolo@zappolofarwell.com)) ([jfarwell@zappolofarwell.com](mailto:jfarwell@zappolofarwell.com)) ([filings@zappolofarwell.com](mailto:filings@zappolofarwell.com)) this 18<sup>th</sup> day of February, 2021.

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