

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 11-028447(03)

COMERICA BANK,  
A Texas banking association,

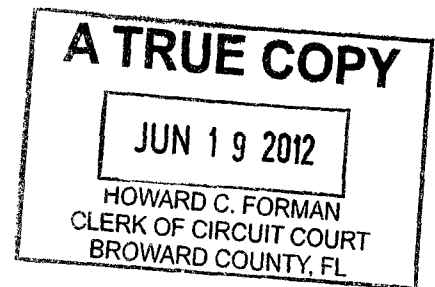
*Plaintiff,*

vs.

OCEAN 4660, LLC a Florida limited liability  
company, OCEANSIDE LAUDERDALE, INC.  
a Florida corporation, KENNETH A. FRANK,  
Individually, *et. al.*,

*Defendant(s).*

\_\_\_\_\_ /



**MOTION FOR ENLARGEMENT OF TIME**

The Defendant, KENNETH A. FRANK, *Individually*, hereby moves this Court for  
an Enlargement of Time to respond to the Complaint, as follows: \_\_\_\_\_

1. This is a Mortgage Foreclosure action that, by its nature, has complex and intricate details which can only be obtained through receipt of additional documentation, yet to be provided by Plaintiff.

2. By way of agreed Order, the Court deemed filed and served the Plaintiff's Second Amended Complaint for Foreclosure in the above action on or about May 30, 2012.

3. A Response to the Mortgage Foreclosure Complaint is due on or before June 19, 2012.

4. The undersigned acting *Pro Se* requires additional documents to file a response.

5. The undersigned will be submitting a Qualified Written Request (QWR) in the near future, to obtain fees, costs and escrow accounting of the above- referenced loan pursuant to REMIC rules, state and federal securities laws, the Investment Company Act of 1940, and the Trust Indenture Act of 1939 and Real Estate Settlement and Procedures Act (RESPA), 12 U.S.C. § 2605(e) ( applicable due to acceptance of TARP funding ).

6. The undersigned have submitted a Request for Production that was served on the Plaintiff on June 19, 2012.

7. Pending the receipt of the above-referenced documents, the undersigned will then be able to formulate a more detailed response to the Mortgage Foreclosure Complaint.

8. Due to the recent amendment of the complaint, the complex nature of this foreclosure proceeding, Request for Production, the undersigned needs additional time to properly respond to the Complaint.

9. This Motion is not being made for improper delay or for any other improper purpose; rather this Motion is being made in an effort to file an informed response to said Complaint.

Wherefore, the Defendants ask that this Court grant them additional time to serve their Response to the Complaint.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been mailed this 19<sup>th</sup>

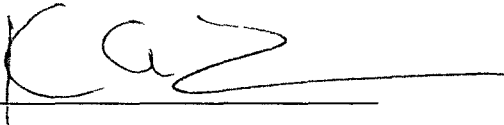
day of June, 2012, to HOLLAND & KNIGHT LLP, c/o Brian K. Hole, Esq., Florida Bar No.:

0019968, Attorneys for the Plaintiff, 515 East Los Olas Boulevard, Suite 1200, Fort Lauderdale,  
Florida 33301.

KENNETH A. FRANK, *Pro Se*  
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By:   
Kenneth A. Frank, *Pro Se*