

MG

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR CIVIL ACTION, COLLIER COUNTY FLORIDA

21ST MORTGAGE COPORATION
QUINTARRIROS, PRIETO, WOOD & BOYER, PA.
Nichole P. Planell (Fl. Bar # 072325)
9300 South Dadeland Blvd. 4th Floor Miami Florida 33156
Email: servicecopies@QPWBLAW.com
Email: Nicole.planell@QPWBLAW.com
(plaintiff)

v.

Civil Action Case No: 15-CA-01170

Division: Foreclosure

MARION J. GREGORY (Limited Guardian)
9202 Vanderbilt Drive Naples Florida 34108
Email: Naplesmarion@aol.com
Mary Jean Ziska
(defendant)

MOTION FOR EXTENSION OF HEARING

Comes Now Defendant Marion Gregory (from this time forth known to be representing Mary Jean Ziska as her Limited Guardian). Who was previously represented by defending lawyer Linda Yerger Fl Bar# 4645893 of Yerger/Tyler PA. Attorneys at law firm : Yerger/Tyler PA Attorneys at Law, 1570 Shadowlawn Drive Naples Florida 34104-4321.

Pursuant to the Florida Rules of Civil Procedure, Rule (1.090 (b)) and current Administrative Orders of the Court; Defendant Marion Gregory, formally requests permission to extend the allowable time to accomplish the listed actions stated within this document. Marion Gregory is request for an extension in the hearing of and any further proceedings of case no. 15-CA-01170. This extension from the October 25th 2016 10:00 am date and time of being heard in this court is made for reasons as stated:

1. Linda Yerger Fl Bar# 4645893 of Yerger/Tyler PA. Attorneys at law firm : Yerger/Tyler PA Attorneys at Law, 1570 Shadowlawn Drive Naples Florida 34104-4321. has removed herself from the case as per MOTION TO WITHDRAWL AS COUNSEL FOR DEFENDANT. Filing #47199191 E- filed 10/03/2016 @ 02:38:04PM and representation must be obtained to replace her in case: 15-CA-01170. Duties required are beyond scope of capability for Marion Gregory (defendant) to perform "pro se" lawyer including knowledge of laws, continuation of litigation, performing all duties both executing both written and oral arguments in the form of motions, objections and/or appeals. Marion Gregory (Defendant) requests extension to obtain proper and qualified legal representation and time for the substitution to be familiarized with and prepared to handle case. Since Linda Yergers's withdrawal from representation Marion Gregory

MG

(Defendant) has not been given the opportunity to adequately consult with an alternate attorney, let alone hire one for representation and for this reason requests the extension before being heard before this court.

2. Paperwork and all information of the past proceedings needs to be collected by execution of the "Defendants Request For Production of Documents" Filed at Clerk of Court Collier County and mailed to:
 - a. 21st Mortgage Corporation (Attorney: Nicole P. Planell Fl. Bar # 072325) Quintaros, Prieto, Wood and Boyer, PA. 9300 South Dadeland Blvd. 4thFloor Miami Florida 33156 Tel. # 855-287-0240).
 - b. Linda Yerger Fl Bar# 4645893 of Yerger/Tyler PA. Attorneys at law firm : Yerger/Tyler PA Attorneys at Law, 1570 Shadowlawn Drive Naples Florida 34104-4321.
3. Marion Gregory submitted additional objection to request for magistrate and requests extension to include having this case seen before a judge instead of Magistrate David J Friedman.
4. New and Additional defense materials and information not presented previously need to be addressed, prepared, and executed for defense's use including:
 - a. Expert witnesses
 - b. Forensic audits
- c. Five points not addressed in defense strategy by attorney Linda Yerger. These critical points should have been addressed prior to the Foreclosure and subsequent Foreclosure Sale. These questions have been presented to Attorney Linda Yerger (via formal requests in emails) and are still unanswered.

Marion Gregory (Defendant) is hereby requesting a 90 day minimum extension from the Octobe 25th 2016 date. Marion Gregory (Defendant) be granted and to have this matter heard by a Judge pursuant to Rule 1.490(c) of the Florida Rules of Civil Procedure and current Administrative Orders of the Court. Defendant, Marion Gregory makes this request in writing and files it with the Clerk of Court in the Circuit Court of the Twentieth Judicial Circuit in and for Civil Action of Collier County. Marion Gregory (defendant) provides copies of this written objection to the circuit Judge: (Honorable Judge Hugh Hayes) and to 21st Mortgage Corporation (attorney: Nicole P. Planell Fl. Bar # 072325) Quintaros, Prieto, Wood and Boyer, PA. 9300 South Dadeland Blvd. 4thFloor Miami Florida 33156 Tel. # 855-287-0240).

Respectfully submitted by MARION J. GREGORY Marion J Gregory (9202 Vanderbilt Drive, Naples, Florida 34108 (239)-598-1515 In the city of Naples State of Florida Collier County. Marion J. Gregory (Defendant) I hereby certify that I served the Motion for Extension to plaintiff (Nicole P. Planell) via U.S. mail and email/efiled to the following attorney of record: Certificate of Service (Nicole P. Planell Attorney or plaintiff Florida Bar (# 072325). Quintaros, Prieto, Wood & Boyer PA. 9300 South DAdeland Blvd. 4th Floor Miami Florida 33156 Tel: (855)287-0240. Email: servicecopies@QPWBLAW.com and Email: Nicole.planell@QPWBLAW.com This 12th day of October, 2016.

Respectfully submitted by Marion J. Gregory Marion J Gregory 9202 Vanderbilt Drive, Naples Florida 34108 (239) 598-1515.