

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 11-22657-Civ-COOKE/TURNOFF

R.K./FL MANAGEMENT, INC. a Florida corporation, R.K. ASSOCIATES VII, INC., a Florida corporation, 17070 COLLINS AVENUE SHOPPING CENTER, LTD., a Florida corporation, RAANAN KATZ, an individual, and DANIEL KATZ, an individual,

Plaintiffs,

v.

JOHN DOE,

Defendant.

**PLAINTIFFS' REQUEST
FOR ORAL ARGUMENT ON DEFENDANT'S MOTION TO DISMISS**

Plaintiffs, R.K./FL MANAGEMENT, R.K. ASSOCIATES VII, INC., 17070 COLLINS AVENUE SHOPPING CENTER, LTD., RAANAN KATZ, and DANIEL KATZ (collectively, the "Plaintiffs"), through their undersigned counsel, file this Request for Oral Argument on Defendant's Motion to Dismiss, and state:

1. In the event this Court denies Plaintiffs' pending Motion to Remand, in accordance with Local Rule 7.1(b)(1), Plaintiffs request oral argument on Defendant's Motion to Dismiss.

2. Plaintiffs believe oral argument will assist the Court in its consideration of the numerous issues presented in the motion, opposition, and reply.

3. Plaintiffs estimate that 30-45 minutes is needed for oral argument on Defendant's Motion to Dismiss.

WHEREFORE, Plaintiffs, R.K./FL MANAGEMENT, R.K. ASSOCIATES VII, INC., 17070 COLLINS AVENUE SHOPPING CENTER, LTD., RAANAN KATZ, and DANIEL KATZ respectfully request in the event this Court denies Plaintiffs' pending Motion to Remand, that this Court grant Oral Argument on Defendant's Motion to Dismiss.

Respectfully submitted,

By: s/Alan J. Kluger

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 29th, 2011, I electronically filed the foregoing document with the Clerk of Court through the CM/ECF System. **I FURTHER CERTIFY** that a true and correct copy of the foregoing has been furnished via U.S. Mail this 29th day of August, 2011 to: **Robert C. Kain, Jr.**, Kain & Associates, Attorneys at Law, P.A., 900 Southeast Third Avenue, Suite 205, Ft. Lauderdale, Florida 33316.

By: s/Alan J. Kluger
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