

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
FAMILY LAW DIVISION

IN RE: THE MARRIAGE OF:

ANDREW CABEZUDO,
Petitioner,

v.

GERALDINE CABEZUDO,
Respondent.

Case No.: 25-2342-FD-12

RESPONDENT'S MOTION TO EXTEND DEADLINE FOR FILINGS

COMES NOW Respondent, **GERALDINE CABEZUDO**, pro se, and pursuant to Rule 1.090, Fla. R. Civ. P., respectfully moves this Court to extend the deadline arbitrarily imposed on September 16, 2025, and in support states:

1. On **September 16, 2025, at 2:51 PM**, this Court sua sponte imposed a filing deadline without providing legal basis or justification.
2. On the very same day, **September 16, 2025, at 10:19 AM**, Non-Party **John Chidester** engaged in email correspondence with Petitioner's Attorney **Garth Goodman** demanding a copy of the original subpoena that was served to him on September 13, 2025. Later that evening, at **11:59 PM**, John filed his **Non-Party Motion to Quash** all three conflicting versions of the subpoena issued by Goodman.
3. It is not coincidental that Judge Helinger's arbitrary deadline was imposed on the **same day** as this email exchange and motion filing. The timing gives rise to a reasonable concern that **impermissible ex parte communication occurred between opposing counsel and the Court**.
4. Additionally, Respondent filed her **Motion to Subpoena John Chidester** at **4:56 PM** on **September 16, 2025**, which the Clerk and Court have failed to process despite her e-filing within the deadline timeline.

5. The refusal to process these filings, combined with the sudden and unexplained imposition of a deadline, materially prejudices Respondent by preventing her from presenting five critical witnesses, including John Chidester, for the October 1, 2025 hearing.
6. Florida law disfavors arbitrary deadlines and exclusion of witnesses unless prejudice or willful misconduct is shown. *Binger v. King Pest Control*, 401 So. 2d 1310 (Fla. 1981).
7. The Florida Supreme Court has emphasized that all litigants must be afforded a meaningful opportunity to be heard. *Perlow v. Berg-Perlow*, 875 So. 2d 383 (Fla. 2004).
8. The Court's failure to process timely filings, combined with the suspicious timing of its *sua sponte* deadline, violates Respondent's due process rights and undermines public confidence in the impartial administration of justice.

WHEREFORE, Respondent respectfully requests this Court:

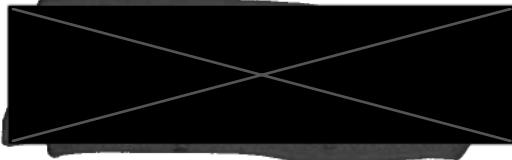
- a. Extend the deadline for filings related to the October 1, 2025 hearing to **September 30, 2025, at 11:59 PM**;
- b. Direct the Clerk to process both the Motion to Subpoena John Chidester (filed at 4:56 PM on September 16, 2025) and the Non-Party Motion to Quash (filed at 11:59 PM on September 16, 2025); and
- c. Grant such other relief as this Court deems just and proper.

Dated: 9/22/25

Respectfully submitted,



GERALDINE CABEZUDO, Pro Se Respondent



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via e-service and/or U.S. Mail this 22 day of September, 2025, to:

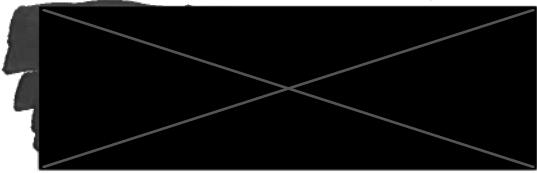
Garth Goodman, Esq., Counsel for Petitioner
146 Second Street North, Suite 310
St. Petersburg, FL 33701
(727) 895-5858

garth@goodmanatlaw.com

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "GC", is written over a blue line that extends from the "Respectfully submitted," text.

GERALDINE CABEZUDO, Pro Se Respondent

A large black rectangular redaction box covers the area where a signature would be placed. A white "X" is drawn across the center of the box.

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PROPOSED ORDER

**ORDER GRANTING RESPONDENT'S MOTION TO EXTEND DEADLINE FOR
FILINGS**

THIS CAUSE having come before the Court on Respondent's Motion to Extend Deadline, and the Court being fully advised in the premises, it is hereby:

ORDERED AND ADJUDGED:

1. Respondent's Motion is GRANTED.
2. The deadline for filings related to the October 1, 2025 hearing is extended to **September 30, 2025, at 11:59 PM**.
3. The Clerk shall process:
 - a. Respondent's Motion to Subpoena John Chidester filed at 4:56 PM on September 16, 2025; and
 - b. Non-Party John Chidester's Motion to Quash filed at 11:59 PM on September 16, 2025.

DONE AND ORDERED in Pinellas County, Florida this ____ day of September, 2025.

Honorable Judge Helinger
CIRCUIT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on opposing counsel of record this 2nd day of September, 2025.

Garth Goodman, Esq., Counsel for Petitioner

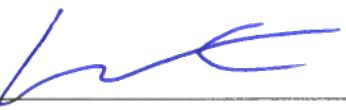
146 Second Street North, Suite 310

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Respectfully submitted,



GERALDINE CABEZUDO, Pro Se Respondent
