SUPREME COURT OF FLORIDA

CASE NO. SC14-80/SC14-82 L.T. No(s): 1D12-3912 10-021122GCC

MIRTA GROSCLOSE,

Appellant/Petitioner,

VS.

OPTIMUM ONCOLOGY – COMPREHENSIVE CANCER CENTER/GALLAGHER BASSETT SERVICES, INC.,

| Appellees/Respondents. | |
|------------------------|--|
| | |

OPTIMUM ONCOLOGY – COMPREHENSIVE CANCER CENTER/GALLAGHER BASSETT SERVICES, INC.,

Appellee/Petitioners,

VS.

MIRTA GROSCLOSE,

| Appel | lant/Respondent | • |
|-------|-----------------|---|
| | | |

UNOPPOSED MOTION FOR EXTENSION OF TIME TO REPLY TO RESPONSE TO ORDER TO SHOW CAUSE

The appellant/petitioner, Mirta Groseclose, respectfully requests this court to grant a thirty day extension of time, to August 31, 2016, for service of her reply to the response to order to show cause filed by the employer/respondent on July 22, 2016. As grounds for this motion, the appellant/petitioner states as follows:

1. The reply is due to be served on August 1, 2016.

2. An extension of this length is necessary due to the fact that Bram

Gechtman, co-counsel for the appellant/petitioner, is out of the country on

vacation.

3. This request for an extension is made in the interest of justice and not

for the purpose of delay.

4. The undersigned contacted Eduardo Neret, counsel for the

employer/respondent, regarding this motion. Mr. Neret agrees to the requested

thirty day extension.

WHEREFORE, the appellant/petitioner, Mirta Groseclose, respectfully

requests this court to grant a thirty day extension of time, to August 31, 2016, for

service of her reply to the response to order to show cause

Respectfully submitted,

BRAM J. GECHTMAN

175 SW 7th St. Suite 1804

Miami, FL 33130

(305) 222-7836 Telephone

(786) 245-8495 Facsimile

bjg@gcflalaw.com

FBN: 538701

-and-

ROBERT J. FIORE

Museum Tower, PH II-2900 150 West Flagler Street

Miami, FL 33130

(305) 358-4011 Telephone

2

(305) 358-4019 Facsimile Robert@robertfirelaw.com paula@robertfiorelaw.com

FBN: 606863

-and-

MARJORIE GADARIAN GRAHAM

Marjorie Gadarian Graham, P.A. 11211 Prosperity Farms Road Oakpark – Suite D 129 Palm Beach Gardens, FL 33410 (561) 775-1204 Telephone (561) 624-4460 Facsimile mgg@appeal.com monica@appeal.com

By: /s/Marjorie Gadarian Graham

Marjorie Gadarian Graham

Florida Bar No. 142053

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has

been furnished by E-Mail this 27th day of July, 2016 to:

Eduardo Enrique Neret, Esq.

FBN: 0967882

Javier A. Finlay, Esq.

FBN: 063278

Neret, Finlay & Nguyen, LLP

2100 Coral Way

Suite 400

Miami, FL 33145

Telephone: (305) 423-3820 Facsimile: (305) 423-3821

eneret@nfnlaw.com
jfinlay@nfnlaw.com

By: /s/Marjorie Gadarian Graham

Marjorie Gadarian Graham

Florida Bar No. 142053