

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,

Appellant/Respondent.

**AMENDED UNOPPOSED MOTION FOR EXTENSION OF TIME TO
REPLY TO RESPONSE TO ORDER TO SHOW CAUSE AND TO TOLL
TIME**

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, and requests that the time for filing the reply be tolled while this motion is pending. 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 and requests that the time to file the reply be tolled while this motion is pending.

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

(305) 358-4019 Facsimile

Robert@robertfiorelaw.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