## IN THE SUPREME COURT OF FLORIDA

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**Case No. SC15-2218** 

STATE OF FLORIDA, AGENCY FOR HEALTH CARE ADMINISTRATION, and WEST JACKSONVILLE MEDICAL CENTER, INC., a foreign corporation,

Petitioners,

v.

BAKER COUNTY MEDICAL SERVICES, INC. d/b/a ED FRASER MEMORIAL HOSPITAL,

Respondent.	

## RESPONDENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO SERVE RESPONSE BRIEF ON JURISDICTION

Respondent, Baker County Medical Services, Inc. d/b/a Ed Fraser Memorial Hospital ("Respondent" or "Fraser"), respectfully moves for an order extending the time for filing its Response Brief on Jurisdiction for ten days, to January 14, 2016. In support of this motion, Respondent states:

1. West Jacksonville Medical Center ("West Jacksonville") filed its Brief on Jurisdiction on December 14, 2015, and so Respondent's Response Brief on Jurisdiction is currently due on January 4, 2016.

- 2. Undersigned counsel does not have sufficient time to complete its Response Brief by January 4, 2016, due to prior litigation deadlines requiring immediate attention and pre-arranged holiday travel plans.
- 3. Undersigned counsel certifies that it has consulted with counsel for Petitioners and that they do not object to this extension request.
- 4. This request is made in good faith and not for purposes of delay. No prejudice will result from the extension sought.

WHEREFORE, Fraser respectfully requests an extension of time to file its Response Brief on Jurisdiction to and including January 14, 2016.

Respectfully submitted this 15th day of December, 2015.

/S/ GEOFFREY D. SMITH

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing has been electronically filed with the Clerk, Florida Supreme Court, on this 15th day of December, 2015. I further certify that copies of the foregoing have been furnished by email to the following on this 15th day of December, 2015:

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