

IN THE SUPREME COURT OF FLORIDA

LUIS TORRES JIMENEZ

Appellant, Defendant below,

v.

Case No.: SC16-1976

District Court No.: 3D15-2303; 3D15-2271

Trial Court No.: 14-TR-000A36-9OZE

STATE OF FLORIDA, by and
through, CITY OF AVENTURA,

Appellee, Plaintiff below,

and

FLORIDA ATTORNEY GENERAL

Appellee/Intervener below.

ATTORNEY GENERAL'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE ANSWER BRIEF

COMES NOW, the Florida Attorney General, Pamela Jo Bondi, as an Appellee, and hereby moves this Court for an extension of time to file her answer brief. The Attorney General respectfully requests an extension of an additional 25 days, added to the 20 days allotted, and as grounds states:

1. This Honorable Court accepted the jurisdiction of this case based on certified questions that raised issues of great public importance.
2. The outcome in this case will likely influence a decision in the federal class action law suit, *Parker, et al. v. Florida Department of Revenue, et al.*, No.

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1:14-cv-24010-FAM (S.D. Fla.), wherein over 80 local Florida government entities are being sued for the return of hundreds of millions of dollars in fines based on the holding in the case of *Hollywood v. Arem*, 54 So. 3d 359 (Fla. 4th DCA 2014).

3. To effectively respond to the large number of issues of great importance, it will take the undersigned counsel longer than the 20 days allotted.
4. The Petitioners unopposed motion for an additional 25 days to prepare the initial brief was granted. Therefore, the Petitioner was given 45 days to file the initial brief.
5. The Attorney General is merely asking for the same extension of time to file her answer brief.
6. Also, the deadline for the filing of the initial brief falls on June 30, 2017, the Friday before the July 4th holiday. This means that part of the 20 day period in which to work on the answer brief falls during the holiday and the undersigned has standing plans to participate in a family reunion during that time period.
7. The undersigned has conferred with counsel, Edward Guedes, for the City of Aventura, and counsel, Stephen Rosenthal, for Mr. Jimenez and both have graciously consented to the Attorney General's request for this extension of time.

WHEREFORE, the Attorney General, Pamela Jo Bondi, prays this honorable Court enter an order granting an extension of time to file an answer brief in this matter 45 days from the date that the initial brief is filed by the Appellant.

Respectfully submitted,

PAMELA JO BONDI
ATTORNEY GENERAL

/s/ Robert Dietz

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 14, 2017, a true copy of this document has been filed through the Florida e-filing portal that furnishes a copy by e-mail to Edward Guedes, Esq., and Samuel I. Zeskind, Esq., of Weiss Serota Helfman Cole & Bierman, P.L., counsel for the State of Florida, by and through the City of Aventura, at eguedes@wsh-law.com, szeskind@wsh-law.com, and szavala@wsh-law.com; and to Ted L. Hollander, Esq., Gold and Associates, P.A., d/b/a The Ticket Clinic, Louis Arslanian, Esq., Marc Wites, Esq., Stephen Rosenthal, Esq.,

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/s/ Robert Dietz

Robert Dietz

Senior Assistant Attorney General