

IN THE SUPREME COURT OF FLORIDA

CASE NO. SC16-1976
L.T. Case Nos. 3D15-2303; 3D15-2271

LUIS TORRES JIMENEZ,

Petitioner,

vs.

STATE OF FLORIDA, et al.,

Respondents.

**CITY OF AVENTURA'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO SERVE ANSWER BRIEF
ON MERITS**

ON DISCRETIONARY REVIEW
FROM THE THIRD DISTRICT COURT OF APPEAL

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Respondent, the State of Florida, by and through the City of Aventura (“City”),¹ respectfully requests that the Court enter an order granting the City an additional 14 days within which to serve the answer brief on the merits.

1. Petitioners served their initial brief on June 30, 2017, after seeking and obtaining an unopposed 25-day extension of time. Similarly, the Court on June 15, 2017, granted the Attorney General’s unopposed motion for a similar 25-day extension of time, making the Attorney General’s brief due 45 days after the initial brief was filed. As a result, the Attorney General’s answer brief on the merits was due no later than August 14, 2017.

2. In light of the Attorney General’s extension of time and the need to coordinate with potential amici as well as the Attorney General, the City sought and obtained an unopposed extension of time making its answer brief also due no later than August 14, 2017.

3. Since then, the Attorney General has sought and obtained, without opposition, a further extension of time for her answer brief, making it due now no later than August 28, 2017. Traveling and work commitments of the Solicitor General necessitated the reasonable extension.

4. The City continues to need to coordinate with the Attorney General in the formulation and presentation of issues before this Court. To that end, it is reasonable that both answer briefs on the merits be filed by the same deadline.

¹ While this appeal is styled in the name of the State of Florida, it was the City that prosecuted the proceedings below and is tasked with enforcement of red light camera violations within its jurisdiction.

5. Undersigned counsel has conferred with petitioner's counsel and counsel for the Attorney General, who have graciously indicated that they have no objection to the extension of time requested herein.

6. Accordingly, the City respectfully requests that this motion be granted and the deadline for service of the answer brief on the merits be extended until August 28, 2017.

Respectfully submitted,

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By: /s/ Edward G. Guedes
Edward G. Guedes

Counsel for City of Aventura

CERTIFICATE OF SERVICE

I certify that a copy of this motion was served via E-portal and e-mail this 9th day of August, 2016, on Amit Agarwal, Esq. (Solicitor General) and Rachel Nordby, Esq. (Deputy Solicitor General) (amit.agarwal@myfloridalegal.com and

rachel.nordby@myfloridalegal.com), Office of the Attorney General, The Capitol, PL-01, Tallahassee, Florida 32399-1050; Robert Dietz, Esq. (Senior Assistant Atty. Gen.; Robert.Dietz@myfloridalegal.com), Office of the Attorney General, 501 E. Kennedy Boulevard, Suite 1100, Tampa, FL 33134; and Louis C. Arslanian, Esq. (arsgabriela@comcast.net), Gold & Associates, P.A., 5800 Sheridan Street, Hollywood, Florida 33021; Marc A. Wites, Esq. Wites & Kapetan, P.A. (mwites@mklawyers.com), Co-Counsel for Appellee, 4400 North Federal Highway, Lighthouse Point, Florida 33064; Stephen Rosenthal, Esq., Podhurst Orseck, P.A. (srosenthal@podhurst.com), Sun Trust International Center, One S.E. 3rd Avenue, Ste. 2700, Miami, Florida 33131.

/s/ Edward G. Guedes

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