

IN THE SUPREME COURT OF FLORIDA

LUIS TORRES JIMENEZ,

Petitioner,

Case No. SC16-1976

Lower Case Nos.: 3D15-2303

3D15-2271

vs.

CITY OF AVENTURA, et al.,

Respondents. _____/

**PETITIONER'S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO SERVE REPLY BRIEF**

Petitioner, Luis Torres Jimenez, hereby seeks an extension of time pursuant to Florida Rule of Appellate Procedure 9.300, for service of his reply brief, which will be due on September 22, 2017 after Respondents file their answer briefs by the extended deadline of August 28, 2017. Petitioner respectfully requests an extension of fourteen (14) days, through and including October 6, 2017, in which to serve his reply brief. The basis for the requested extension of time is as follows:

1. When Respondents requested and secured a second for extension of time to serve their answer briefs by August 28, 2017, the presumptive deadline for Petitioner's reply brief shifted to September 22, 2017.

2. That date happens to fall on the holiday of Rosh Hashana, which the undersigned lead counsel for Petitioner observes. The following week is the

holiday of Yom Kippur. An extension beyond these religious holidays would be appreciated.

3. The undersigned has conferred with counsel for Respondents, the City of Aventura and the State of Florida, who have both graciously consented to Petitioner's request for this extension of time.

WHEREFORE, Petitioner respectfully moves this Court for the entry of an order extending the time for service of his reply brief by fourteen (14) days, to and including October 6, 2017.

Respectfully submitted,

/s/ Stephen F. Rosenthal

Stephen F. Rosenthal
Fla. Bar No. 131458
PODHURST ORSECK, P.A.
Sun Trust International Center
One S.E. 3rd Avenue, Suite 2700
Miami, Florida 33131
Tel.: 305-358-2800
srosenthal@podhurst.com

Louis C. Arslanian
5800 Sheridan Street
Hollywood, Florida 33021
Tel.: (954) 922-2926
arsgabriela@comcast.com

Marc A. Wites
WITES & KAPETAN, P.A.
4400 North Federal Highway
Lighthouse Point, Florida 33064
Tel.: (954) 570-8989
mwites@wklawyers.com

Counsel for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Florida Courts E-Filing Portal system on this 22nd day of August, 2017 upon: **Edward G. Guedes** and **Samuel I. Zeskind**, Weiss Serota Helfman Cole & Boniske, P.L., 2525 Ponce de Leon Blvd., Suite 700, Coral Gables, Florida 33134, eguedes@wsh-law.com, szavala@wsh-law.com, szeskind@wsh-law.com, ozuniga@wsh-law.com; **Rachel Nordby** and **Amit Agarwal**, Office of the Attorney General, PL01-The Capitol, Tallahassee, FL 32399-1050, rachel.nordby@myfloridalegal.com, amit.agarwal@myfloridalegal.com; **Robert Dietz**, Office of the Attorney General, 501 E. Kennedy Blvd., Suite 1100, Tampa, Florida 33134, Robert.Dietz@myfloridalegal.com; **E. Bruce Johnson** and **Christopher J. Stearns**, Johnson, Anselmo, Murdoch, Burke, Piper & Hochman, P.A., 2455 East Sunrise Blvd., Suite 1000, Ft. Lauderdale, FL 33304, Johnson@jambg.com, stearns@jambg.com; **Kraig A. Conn** and **David Cruz**, Florida League of Cities, Inc., P. O. Box 1757, Tallahassee, FL 32302, kconn@flcities.com, dcruz@flcities.com.

/s/ Stephen F. Rosenthal
Stephen F. Rosenthal