

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 LEAVE TO FILE
REPLY BRIEF IN EXCESS OF PAGE LIMIT**

Petitioner, Luis Torres Jimenez, hereby seeks permission to file his reply brief in excess of the fifteen pages permitted by Florida Rule of Appellate Procedure 9.210(a)(5)(B). Petitioner respectfully requests leave to file a reply brief of no more than twenty-five (25) pages, and in support thereof states as follows:

1. Respondent, City of Aventura, and Respondent, the Attorney General of Florida, have filed answer briefs of fifty (50) and thirty-four (34) pages respectively. In addition, Florida League of Cities, Inc., as amicus curiae in support of City of Aventura, has filed a brief containing an additional eighteen (18) pages of briefing.

2. The 102 pages of answer briefing that Petitioner must address is double that contemplated under Rule 9.210(a)(5)(B). Consequently, Petitioner

requests an additional ten pages in which to adequately reply to the myriad arguments raised in the two answer briefs and separate amicus brief.

3. The undersigned has conferred with counsel for Respondents, the City of Aventura and the Attorney General of Florida, who have both graciously consented to the relief requested in this motion.

WHEREFORE, Petitioner respectfully moves this Court for entry of an order permitting the filing of a reply brief not to exceed twenty-five (25) pages.

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 25th day of September, 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