

## In the Florida Supreme Court

**MRI ASSOCIATES OF TAMPA,  
INC., d.b.a. Park Place MRI,**

Petitioner,

vs.

**Fla. S. Ct. Case No. SC18-1390**

**STATE FARM MUTUAL  
AUTO. INS. CO.,**

Fla. 2d DCA Case No. 2D16-4036

Respondent.

**PETITIONER'S UNOPPOSED MOTION  
TO EXPAND PAGE-LIMIT OF REPLY BRIEF**

Pursuant to Florida Rule of Appellate Procedure 9.300, the Petitioner, MRI Associates of Tampa, Inc., doing business as Park Place MRI, moves to expand the page limit of its reply brief by 1 page, and states:

1. This case is before the Court on a certified question of great public importance.
2. The factual and legal issues in this case are complex and important, and the record is voluminous.
3. The Respondent's answer brief on the merits is 46 pages long. In addition, the amicus brief filed by American Property Casualty Insurance Association and Personal Insurance Federation of Florida in support of the Respondent is an additional 20 pages long. Consequently, the Petitioner's reply brief is responding to 66 pages. That 66 pages equates to 132% of the 50-page limit for

answer briefs established by Florida Rule of Appellate Procedure 9.210(a)(5)(B).

4. After several drafts, the Petitioner's proposed reply brief is 16 pages long, and a copy of that proposed reply brief is being filed simultaneously with this motion. That 16 pages equates to about 107% of the 15-page limit for reply briefs established by Florida Rule of Appellate Procedure 9.210(a)(5)(B). Compared to 132% combined size the answer brief and amicus brief, the 107% size of the proposed reply brief is reasonable.

5. Moreover, the 16th page of the proposed reply brief is entirely devoted to arguments presented in response to the 20-page amicus brief.

6. No party will be prejudiced if this motion is granted.

7. The undersigned attorney has communicated with the Respondent's attorney (i.e., Nancy A. Copperthwaite, Esquire), and is authorized to represent to this Court that the Respondent does not object to the proposed 1-page expansion requested by this motion.

**WHEREFORE**, the Petitioner respectfully requests this Honorable Court to expand the page limit of its reply brief by 1 page, and to accept as filed the proposed 16-page reply brief filed along with this motion.

#### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy hereof was **Electronically Filed** with the Clerk of the Court, and **Electronically Served** on the

following persons on this 3rd day of JANUARY, 20 20:

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Respectfully submitted,



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