

**IN THE SUPREME COURT OF FLORIDA**

**CASE NO. SC18-320**

AMERICAN SOUTHERN HOME  
INSURANCE COMPANY,

L.T. Case No.: 5D17-326

Petitioner,

vs.

LOUIS PHILIP LENTINI, ETC.,

Respondent.

\_\_\_\_\_/

**PETITIONER'S MOTION FOR 30-DAY  
EXTENSION OF TIME TO FILE INITIAL BRIEF**

Petitioner American Southern Home Insurance Company moves for a 30-day extension of time to file its initial brief.

1. This Court agreed to accept jurisdiction of this case on April 30, 2018. Pursuant to that Order, Petitioner's initial brief is due on or before May 21, 2018.

2. Due to the press of other appeals and trial-court matters, and a pre-planned vacation, counsel for Petitioner needs some additional time to review and assess the record, the decision below, and to prepare the initial brief.

3. Currently, counsel for Petitioner, Raoul G. Cantero, has several appellate briefs due in May in other cases, including:

- (a) *Braden Woods Homeowners Ass’n, Inc. et al. v. Mavard Trading, Ltd., et al.*, Case No. 2D17-3795 (Fla. 2d DCA), answer brief filed on April 30, 2018;
  - (b) *Selso Palma Ulloa, et al. v. Fancy Farms, Inc.*, Case No. 18-10536 (11th Cir.), brief of *amicus curiae* due on May 9, 2018.
  - (c) *People’s Trust Insurance Co. v. Tracey, et al.*, Case No. 4D17-3945 (Fla. 4th DCA), reply brief due May 29, 2018; and
  - (d) *People’s Trust Insurance Co. v. Garcia*, Case No. 3D18-0742 (Fla. 3rd DCA), initial brief due May 29, 2018.
4. Counsel for Petitioner is also scheduled to go on a pre-planned vacation from May 4 to May 14.
5. As such, Petitioner requests a 30-day extension to file its initial brief. This Motion is made in good faith and not for the purpose of delay.
6. Respondent’s counsel, Shannon McLin Carlyle, was consulted regarding this request for extension of time and informed the undersigned that the Respondent can only agree to a ten-day extension.
7. WHEREFORE, Petitioner requests a 30-day extension of time, until Wednesday, June 20, 2018, to file its initial brief.

Submitted on May 4, 2018:

By: /s/ Raoul G. Cantero  
Raoul Cantero

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*Counsel for Petitioner*

**CERTIFICATE OF SERVICE**

I CERTIFY that the foregoing was filed with the Clerk of Court and served electronically via the Florida Courts E-Portal System to the following parties on this 4th day of May 2018:

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By: /s/ Raoul G. Cantero  
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