

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Complainant,

v.

BRUCE JACOBS,

Respondent.

Supreme Court Case
No. SC20-1602

Florida Bar File

No. 2019-70, 188 (11 H)

No. 2019-70,358 (11H)

No. 2020-70,056 (11 H)

**RESPONDENT'S MOTION TO DEEM INITIAL BRIEF
FILED AT 12:08AM ON JUNE 24, 2022 TIMELY FILED**

Respondent, Bruce Jacobs, Esq. ("Jacobs") files his Motion to to Deem Initial Brief Filed at 12:08AM on June 24, 2022 Timely Filed, and states:

1. On June 17, 2022, Respondent's counsel filed a motion to withdraw after The Florida Bar ("TFB") objected to extensions to respond to the unprecedented onslaught of what is now 14 bar complaints, including 7 that arose since April of 2022.

2. Respondent's counsel informed this Honorable Court he was frankly overwhelmed by concurrent deadlines to respond to 5 new bar complaints to TFB, a 6th criminal contempt proceeding from the Third DCA, and file this initial brief by 5pm on June 20, 2022.

3. Respondent's counsel informed this Honorable Court he was "representing clients in significant bankruptcy hearings in federal court this week and Mr. Jacobs has been at scout camp in North Carolina with his sons

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without proper wifi signal.”

4. Respondent’s counsel informed this Honorable Court he felt he had to withdraw as “the reality of the situation and the overwhelming onslaught of bar deadlines made it impossible to represent Mr. Jacobs in a manner consistent with the Rules Regulating The Florida Bar.”

5. On June 20, 2022, this Honorable Court denied the motion to withdraw and the request for a one week extension to file the initial brief by June 27, 2022.

6. Jacobs believed in good faith the motion to withdraw tolled the deadline to file his brief until 5pm on Thursday, June 23, 2022. Yet in an abundance of caution, filed his initial brief as it stood at 4:59pm on Monday, June 20, 2022. Jacobs advised the court his counsel had no opportunity to review so it was being filed *pro se* with the intention of filed a corrected brief.

7. As it also happens, Jacobs’ head paralegal is losing her grandmother to cancer could not file that *pro se* initial brief with a table of contents and table of authorities until 10pm on June 20, 2022.

8. On Thursday, June 23, 2022, with the assistance of counsel, Jacobs filed his initial brief as it stood at 5:06PM, again without a proper table of contents or authorities as his head paralegal was with her grandmother.

9. At 12:08AM on June 24, 2022, Jacobs filed his initial brief in

proper form with substance worthy of submission to this Honorable Court.

10. Jacobs initial brief sets forth controlling U.S. Supreme Court authority that squarely protects his constitutional rights to truthfully criticize judges in fraudulent foreclosures which should be considered on the merits.

11. Jacobs filed his initial brief at the earliest possible time, dealing with his attorney's attempt to withdraw, his long-standing summer camp plans, his concurrent deadlines set by TFB and the Third DCA, and his head paralegal losing her grandmother -- Days before the requested extension.

12. Jacobs respectfully submits there is no prejudice to TFB to having to respond to his arguments on the merits. In the interest of justice, Jacobs requests this Honorable Court deem his latest initial brief timely filed.

WHEREFORE, Jacobs respectfully requests this Honorable Court deem his initial brief filed 12:08AM on June 24, 2022 timely filed, and grant any further relief deemed mete and just.

Respectfully submitted,
/davidjwinker/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was filed with the Florida Courts e-filing Portal, and served on all those on the Service List, either via Notices of Electronic Filing generated by the e-Portal system or another authorized manner on June 24, 2021.