

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Complainant,

Case No. SC20-1602

v.

The Florida Bar File Nos.:
2019-70,188 (11H)
2019-70,358 (11H)
2020-70,056 (11H)

BRUCE JACOBS,

Respondent.

_____ /

REQUEST FOR EXTENSION OF TIME TO FILE REPLY/ANSWER BRIEF

Respondent, Bruce Jacobs, by and through the undersigned counsel, files this request for extension of time to file reply/answer brief and states:

1. The undersigned counsel has just filed a notice of appearance as co-counsel for Mr. Jacobs.

Procedural History

2. The amended referee's report was filed in this Court on December 10, 2021.

3. On January 21, 2022, The Florida Bar filed a letter with this Court advising the Bar would be filing a notice of intent to seek review of the report of referee.

4. On February 02, 2022, Respondent filed his notice of intent to seek review of a report of referee.

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5. On February 03, 2022, The Florida Bar filed its notice of intent to seek cross-review of report of referee.

6. After motions for extension of time were considered by this Court, Respondent's initial brief was filed on June 20, 2022.

7. After the filing of amended briefs by Respondent, The Florida Bar filed a motion to strike briefs and response in opposition to respondent's new motions on June 27, 2022.

8. By order dated July 19, 2022, this Court granted Respondent's "Motion to Deem Initial Brief Filed at 12:08AM on June 24, 2022 Timely Filed", struck Respondent's other briefs, and advised The Florida Bar it may file an answer/cross-initial brief on or before August 8, 2022. This Court also denied the Bar's "Motion to Strike Briefs and Response in Opposition to Respondent's New Motions."

9. The Florida Bar's Answer/Cross-Review Initial Brief was filed on August 05, 2022.

Grounds for Extension of Time

10. As stated above, the undersigned counsel has just filed a notice of appearance as co-counsel for Mr. Jacobs. The record in this case is voluminous.

11. By email dated August 26, 2022, Chris Altenbernd, Counsel for The Florida Bar, advised the undersigned he would not object to an

extension of time of 15 days from August 25, 2022. This would make Respondent's reply/answer brief due on September 9, 2022.

12. Counsel appreciates Mr. Altenbernd's position, but submits that is not enough time in which to file a complete reply/answer brief on behalf of Mr. Jacobs.

WHEREFORE, Respondent requests this Court grant an extension of time of 30 days from the filing of this motion in which to file his reply/answer brief.

Respectfully submitted,

/S/ Richard A. Greenberg

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Attorneys for Respondent

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing has been filed by e-mail to Tonya Avery, Bar Counsel, at tavery@floridabar.org, Patricia Ann Toro Savitz, Staff Counsel, at psavitz@floridabar.org, Chris W. Altenbernd, Counsel for The Florida Bar, at caltenbernd@bankerlopez.com, David J.

Winker, Co-counsel for Respondent at dwinker@dwrlc.com, and Bruce Jacobs, Respondent/Co-counsel, at jacobs@jakelegal.com this 30th day of August, 2022.

/S/ Richard A. Greenberg

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