

IN THE SUPREME COURT OF FLORIDA  
(Before a Referee)

THE FLORIDA BAR,  
  
Complainant,

SUPREME COURT CASE  
NO. SC20-1777

v.

The Florida Bar File  
No. 2019-10,038(20A)

RAYMOND B. MITCHELL

Respondent.

**MOTION FOR EXTENSION OF TIME**

The Respondent, Raymond B. Mitchell, by and through the undersigned counsel files this *Motion for Extension of Time*, and would state as follows:

1. Respondent moves this court for an order extending the time for the Respondent to file the initial brief by 45 days up to November 1, 2021. As grounds for this Motion the Respondent alleges:

a. Currently, the last day to file the initial brief is September 16, 2021. An extension of 45 days would put the last day on or around November 1, 2021.

b. Respondent's attorney has been very busy recently since July 12, 2021 when the sole paralegal he had working for him for over four years suddenly quit and resigned without any notice to Respondent on July 9, 2021 when she and Respondent were getting along in the office work extremely well with no problems at all (she was his only assistant or employee working for him since

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September 2019). Respondent did not know she had resigned on July 9, 2021 with no intention of working for Respondent any longer until Monday July 12, 2021 when Respondent found a letter written by the paralegal stating she quit, thanked me for working here, and her office keys were in the envelope. Since July 12, 2021 Respondent has worked in his office by himself with no paralegals, no assistants, no employees. That has increased the workload about double for Respondent since Respondent has not been able to afford financially or with time to interview, hire, and train another paralegal or part time attorney for the last two months as the business has been very slow with it being the summer (snowbirds leave) and with the slow economy due to the Covid-19 outbreak. *(Respondent used to have two mostly full-time paralegals for many years until Sept. 2019 when one resigned after working here six years).* Respondent could not afford to pay a paralegal based on the gross income during this summer of 2021 and wanted to spend time drafting the Initial Brief in this Bar case instead of interviewing potential employees and has been swamped with the work in the bankruptcy and family law cases.

c. Respondent also needs time for the transcripts of the trials covering four different days/trial-hearing-dates to be prepared in this Florida Bar case as Respondent was only able to pay the \$2,750 fee recently to Fernandez & Associates court reporters they wanted to type and prepare the transcripts and

Respondent did pay them on or around August 31, 2021. Respondent must refer to the transcripts in his Initial Brief per the Rules of Appellate Procedure. Fernandez & Associates court reporters said and wrote in emails that they needed 30 days to have enough time to prepare the four days of trial transcripts, thus the transcripts should be prepared and ready to file and refer to around October 1, 2021 or so. Once they are prepared that would give Respondent about 30 days remaining days to complete the Initial Brief by inserting the references to the transcripts of the trial into the Initial Brief.

d. Respondent was also burdened with some trials (bankruptcy and family law trials) and had to spend much time preparing for them and attending trials. Attorney will have more free time in the next few weeks/months to complete the initial brief, and perhaps may be able to hire another employee to assist him in his office duties freeing up some of his time to work on this review/appeal.

d. I telephoned and emailed the Florida Bar, Complainant, (Joi L. Pearsall, Esq.) and their Co-Counsel at Holland & Knight LLP at their listed number and emails but I did not receive an answer and I do not know if she/Florida Bar/Co-Counsel does not oppose this Motion and does not object to extending the time to file the initial brief for 45 days (since this Motion was drafted very late in the evening but Respondent did not have time to draft this Motion until this evening since he just

completed a long bankruptcy adversary trial this afternoon today [taking several hours altogether] and had a long family law hearing yesterday afternoon also [that took nearly three hours altogether] along with working on the many other cases and communicating with clients).

e. This Motion is filed in good faith and not for the purpose of delay.

#### CERTIFICATE OF MOVANT'S COUNCEL

I, Raymond B. Mitchell, attorney for Respondent/movant, certify that I telephoned / emailed opposing counsels for the Florida Bar and I am authorized to represent that I do not know if they do not oppose this Motion or agree.

#### CERTIFICATE OF SERVICE

I certify that a copy of this document (Motion) was emailed to Joi L. Pearsall and to all the persons/emails listed below on September 15, 2021:

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