

**IN THE SUPREME COURT OF FLORIDA
(Before a Referee)**

**THE FLORIDA BAR,
Complainant,**

**Case No. SC20-842
The Florida Bar File No.
2019-70,468 (11C)**

v.

**SCOT STREMS,
Respondent.**

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**RESPONDENT'S SECOND UNOPPOSED MOTION FOR
EXTENSION OF TIME TO SERVE ANSWER BRIEF**

Respondent Scot Stremms seeks an extension of time for five (5) additional days to serve his answer brief. This request is unopposed. The following good faith reasons support this requested extension.

1. Pursuant to Florida Bar Rule 3-7.7(c)(3), respondent's answer brief is due September 22, 2021, the result of an unopposed extension of time for thirty (30) days.

2. Respondent has been endeavoring to complete the answer brief and is in the process of finalizing edits and rewrites to be able to present a comprehensive submission to the Court. The process of combing through an extensive evidentiary record and completing all necessary research and final drafting requires an additional extension of time for five (5) days.

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3. Undersigned counsel has been tasked with a number of competing obligations that have required significant time away from this matter, including but not limited to completing a bar grievance trial in *The Florida Bar v. Jonathan S. Schwartz*, SC21-848, on September 13-15, 2021, and drafting a proposed Report of Referee in that matter. Respondent's counsel is also drafting an answer brief in the public records appeal of *City of Sunny Isles Beach v. Gatto*, 3D21-1003, and conducting final preparation for a multi-defendant, multi-week federal criminal trial in *United States v. Braun*, U.S.D.C. Case No. 2019-Cr-80030-Dimitrouleas (S.D. Fla.), set for trial on October 12, 2021. Finalizing the responsibilities attendant to witness preparation and preparing for that trial has been an exhaustive and time-intensive process, necessitating time away from counsel's dedication to the demanding requirements in this appeal.

4. Counsel has carefully adhered to this Court's notice that additional extensions are not favored and is endeavoring to complete the Answer Brief without unnecessary delay. The requested five-day extension will enable respondent to present a thorough and comprehensive brief that is reflective of the extensive record and multiple legal issues involved.

5. Accordingly, respondent requests an additional extension of five (5) days until Monday, September 27, 2021.

6. Counsel for The Florida Bar, Chris Altenbernd, does not oppose this requested extension.

7. This requested extension will advance the cause of justice, will not unduly delay resolution of this case, and will serve the interests of this Court in receiving a comprehensive discussion of the facts and legal authority at issue on appeal.

Respectfully submitted,

S/ Benedict P. Kuehne
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the has been furnished this September 20, 2021, via the State of Florida's E-Filing Portal, to: Chris W. Altenbernd, service-caltenbernd@bankerlopez.com, John Derek Womack, Bar Counsel, The Florida Bar, jwomack@floridabar.org; Patricia Ann Savitz, Staff Counsel, The Florida Bar, psavitz@floridabar.org.

/s/ Benedict P. Kuehne
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