

IN THE
Supreme Court of Florida

Case No.: SC21-159

Eleventh Circuit Court of Appeals Case No.: 19-10474

STEVEN J. PINCUS, ETC.,

Appellant,

v.

AMERICAN TRAFFIC
SOLUTIONS, INC., ETC.,

Appellee.

APPELLEE’S UNOPPOSED MOTION FOR EXTENSION OF TIME

Appellee, AMERICAN TRAFFIC SOLUTIONS, INC., respectfully moves this Court for an extension of time of 30 days within which to file and serve Appellee’s Answer Brief, to and including **May 12, 2021**, with all other deadlines extended accordingly. The relief sought is unopposed. In support, Appellee states as follows.

1. Appellant filed his Initial Brief on March 12, 2021. Pursuant to this Court’s order entered on February 4, 2021, Appellee’s Answer Brief is due on or before April 12, 2021.

2. Undersigned counsel’s other professional commitments impact their ability to complete a suitable brief on the current

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schedule. Moreover, the COVID-19 pandemic has caused certain disruptions to their daily practices. For those reasons, undersigned counsel request an extension of 30 days, to and including **May 12, 2021**, to file and serve Appellee's Answer Brief.

3. This motion is filed in good faith and not for purposes of delay. The granting of this extension will not prejudice any party to this case.

4. Counsel for Appellee have consulted with counsel for Appellant STEVEN J. PINCUS, Bret L. Lusskin, and are authorized to represent that Appellant does not oppose this extension request.

WHEREFORE, Appellee, AMERICAN TRAFFIC SOLUTIONS, INC., respectfully requests an extension of time of 30 days to file and serve Appellee's Answer Brief, to and including **May 12, 2021**.

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March 24, 2021

Respectfully submitted,

/s/ Joseph H. Lang, Jr.

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Counsel for Appellee

American Traffic Solutions, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing unopposed motion for extension of time was filed with the Clerk of Court and served via Florida Courts ePortal email on the following this 24th day of March, 2021.

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