

**IN THE SUPREME COURT OF FLORIDA**

STEVEN J. PINCUS, an individual, on behalf  
of himself and all others similarly situated,

Florida Supreme Court  
Case No. SC21-159

Appellant,

v.

Eleventh Circuit  
Case No. 19-10474

AMERICAN TRAFFIC SOLUTIONS, INC.,  
a Kansas corporation,

Appellee.

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**APPELLANT STEVEN J. PINCUS'S  
MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF**

Pursuant to Rule 9.300 of the Florida Rules of Appellate Procedure, Appellant STEVEN J. PINCUS moves the Court for an extension of 30 days, through and including **July 11, 2021**, to file and serve Appellant's reply brief.

1. Appellee American Traffic Solutions (ATS) filed its answer brief on May 12, 2021. Pursuant to this Court's order on February 4, 2021, Appellant's reply brief is due on or before June 11, 2021.
2. On June 3, 2021, pursuant to leave, the Florida Office of Financial Regulation (OFR) filed its *amicus curiae* brief in support of ATS's answer brief.
3. This affords Appellant only eight (8) days to review, research, and prepare argument in response to the OFR's *amicus* brief. This is an inadequate window of time.

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4. Accordingly, the undersigned respectfully requests an extension of thirty (30) days, through **July 11, 2021**, to submit Appellant's reply brief.
5. 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.
6. The undersigned has conferred with counsel for ATS, and is authorized to represent that ATS does not oppose this request.

Dated this 4th day of June, 2021.

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By: /s/ Bret L. Lusskin, Esq.  
Bret L. Lusskin, Esq.  
Florida Bar No. 28069

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that this Motion has been E-filed using the E-filing Portal and that a copy has been sent via email to the following parties this 4th day of June, 2021: Kevin P. McCoy ([kmccoy@carltonfields.com](mailto:kmccoy@carltonfields.com)), Joseph H. Lang ([jlang@carltonfields.com](mailto:jlang@carltonfields.com)), David R. Wright ([DWright@carltonfields.com](mailto:DWright@carltonfields.com)), and David M. Costello ([david.costello@myfloridalegal.com](mailto:david.costello@myfloridalegal.com)).

By: /s/ Bret L. Lusskin, Esq.  
Bret L. Lusskin, Esq.