

**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.

\_\_\_\_\_ /

**APPELLANT STEVEN J. PINCUS'S  
MOTION TO FILE ENLARGED REPLY BRIEF**

Pursuant to Rule 9.300 of the Florida Rules of Appellate Procedure, Appellant STEVEN J. PINCUS moves the Court to enlarge the word limit applicable to his reply brief by 3,000 words, raising the limit to 7,000 words.

1. On June 3, 2021, pursuant to leave, the Florida Office of Financial Regulation (OFR) filed its *amicus curiae* brief in support of Appellee American Traffic Solutions (ATS)'s answer brief.
2. The OFR's *amicus* brief asserts novel and complex arguments that have not been heretofore addressed by the Appellant, and which were not asserted in ATS's answer brief.
3. The default 4,000-word limit applicable to Appellant's reply brief is inadequate to fully respond to both ATS's answer brief and the OFR's *amicus* brief.

RECEIVED, 06/04/2021 03:53:27 PM, Clerk, Supreme Court

4. Accordingly, Appellant respectfully requests leave to file a reply brief of no more than 7,000 words in response to both ATS's answer brief and the OFR's *amicus* brief.
5. Counsel for Appellant has conferred with counsel for ATS, and the undersigned is authorized to represent that ATS does not oppose Appellant's request.

Dated this 4th day of June, 2021.

BRET L. LUSSKIN, Esq.  
Attorney for Plaintiff  
20803 Biscayne Blvd., Ste 302  
Aventura, Florida 33180  
Telephone: (954) 454-5841  
Facsimile: (954) 454-5844  
blusskin@lusskinlaw.com

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 ([jlant@carltonfields.com](mailto:jlant@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.