

IN THE SUPREME COURT OF FLORIDA

BRINDA COATES, etc.,

Petitioner,

v.

Case No.: SC21-175

L.T. Nos.: 5D19-2549

R.J. REYNOLDS TOBACCO
COMPANY,

1997-CA-004541-O

Respondent.

**PETITIONER'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE INITIAL BRIEF ON THE MERITS**

Petitioner, Brinda Coates, individually and as personal representative of the estate of Lois Stucky, moves for a thirty-day extension of time to serve her initial brief on the merits and states:

1. The Court having granted Petitioner's only prior request for an extension, the initial brief on the merits is currently due September 13, 2021.

2. Despite the best efforts of Petitioner's counsel, they will be unable to file the brief by the deadline. Counsel are aware that multiple extension requests are disfavored and endeavored to meet the deadline without asking for another extension. This has not been possible due largely to the confluence in some turnover of

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personnel at the Bishop & Mills firm and two major trials set in October that have required a tremendous amount of preparation time. More specifically, the associate originally assigned to prepare the initial draft of this brief, Jonathan Martin, had to be reassigned from preparing this brief to assisting in trial preparations. Two new associates will be starting over the next two months, including one that will be focused full-time on trial litigation, which will allow Mr. Martin to return his full-time attention to the firm's appellate practice.

3. Petitioner anticipates that this extension will allow sufficient time to complete the brief without the need for additional extension requests. Indeed, the undersigned supervising partner, John Mills, has cleared time to draft the brief himself directly to ensure no further delays even if Mr. Martin is unable to assist. Accordingly, no further extensions will be sought absent unanticipated circumstances.

4. Counsel for Petitioner conferred with Brian C. Lea, counsel for Respondent, and is authorized to represent that Respondent does not oppose the requested extension.

WHEREFORE, Petitioner respectfully requests that this Court extend the deadline for serving their initial brief on the merits by thirty days to Wednesday, October 13, 2021.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the following persons by email on September 10, 2021:

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