

IN THE SUPREME COURT OF FLORIDA

Case No. SC 17-65

Lower Tribunal Case Nos. 4D15-266; 4D15-3057;
432014CA001301CAAXMX; 432015CA000124CAAXMX

40 N.E. PLANTATION ROAD,
#306, L.L.C.,

Petitioner,

v.

PNC BANK, NATIONAL ASSOCIATION,
ET AL.,

Respondents.

_____ /

PETITIONER'S MOTION FOR EXTENSION OF TIME TO SERVE
JURISDICTIONAL BRIEF

Petitioner, 40 N.E. PLANTATION ROAD, #306, L.L.C. (the "Petitioner"), pursuant to Rule 9.300 of the Florida Rules of Appellate Procedure, respectfully requests an extension of time, through and including January 31, 2017, in which to serve its jurisdictional brief, and in support thereof states:

1. Petitioner's jurisdictional brief is currently due to be served on or before January 23, 2017.

2. Due to a heavy caseload, counsel for the Petitioner needs an initial extension of time to prepare its jurisdictional brief. *United Auto. Ins. Co. v. Total*

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Rehab Medical Center, 870 So. 2d 866, 868 (Fla. 3rd DCA 2004) (“The appellate rules allow for extensions of time for most steps in the appellate process, including extensions of time for filing briefs. Fla.R.App.P. 9.300. “Successive extensions of time are permissible unless the court has issued an order indicating that no further extensions will be allowed, or the equivalent.”)

3. The Petitioner seeks an initial eight (8) day extension to serve its jurisdictional brief.

WHEREFORE, Petitioner, 40 N.E. PLANTATION ROAD, #306, L.L.C., respectfully moves this court for an extension of eight (8) days to file and serve its jurisdictional brief and for such other relief as this court deems just and proper.

CERTIFICATE OF MOVANT’S COUNSEL PER RULE 9.300(a)

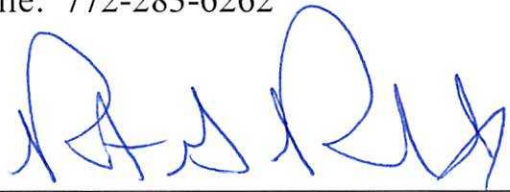
I HEREBY CERTIFY that the undersigned has consulted with opposing counsel, Avri Ben-Hamo, Esq., attorney for Respondent, PNC BANK, NATIONAL ASSOCIATION, regarding this request for an extension of time to file and serve its jurisdictional brief and that counsel for the Respondent objects to this request.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via E-file / Court E-service Only to the parties listed on the Service List who provided email addresses, per Florida Rule of Judicial Administration 2.516, and via Regular U.S. Mail Only to the parties who have not provided an email address this 23rd day of January, 2017

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