

**IN THE SUPREME COURT OF FLORIDA**

JAMES SEADLER,

Plaintiff/Petitioner,

v.

CASE NO. SC22-984

First DCA Case No.: 1D19-850

Circuit Ct. No. 2016-CA-4539

MARINA BAY RESORT  
CONDOMINIUM ASSOCIATION  
d/b/a MARINA BAY RESORT,

Defendant/Respondent.

\_\_\_\_\_ /

**PETITIONER'S UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO SERVE REPLY BRIEF**

Petitioner James Seadler, through his undersigned attorneys, respectfully requests that the Court grant an enlargement of time of two (2) days, through May 17, 2023, to serve his reply brief. In support of this motion, Petitioner states:

1. The Court granted Petitioner's first motion for a 21-day enlargement of time to service Petitioner's reply brief, and the brief is currently due by May 15, 2023.

2. Because of the complexity of the issues involved, and with the additional four Amicus Briefs that have been filed in the case, preparation of the reply brief has taken longer than anticipated to complete.

3. Further, the undersigned's legal assistant will be out of the office on Monday, May 15, 2023, the date the brief is currently due.

4. As a result, counsel will not have time to complete and file the reply brief until after the current due date.

5. This enlargement is not being sought for delay but is being sought solely because of other work and the time required to prepare a concise, responsive reply brief.

6. Counsel for the Respondent has indicated that she has no objection to the requested enlargement.

WHEREFORE, Petitioner respectfully requests the Court grant an enlargement of time of two (2) days, through May 17, 2023, to serve his reply brief in this matter.

Respectfully submitted,

/s/ Charles F. Beall, Jr.

Charles F. Beall, Jr.

Florida Bar No. 66494

Jessica L. Scholl

Florida Bar No. 112167

*cbeall@mhw-law.com*

*jscholl@mhw-law.com*

*tstokes@mhw-law.com*

MOORE, HILL & WESTMORELAND, P.A.

P.O. Box 13290

Pensacola FL 32502

Telephone: (850) 434-3541

*Counsel for Petitioner,*

*James Seadler*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was filed electronically via the Court’s E-Filing Portal on this 12th day of May, 2023. The submission will be electronically served to all parties pursuant to Florida Rules of Judicial Administration, specifically including:

Jonathan D. Simpson  
SIMPSON LAW FIRM  
1048 Mar Walt Drive  
Ft. Walton Beach FL 32547  
*jd@simpsoninjurylaw.com*  
*Kristina@simpsoninjurylaw.com*  
  
*Trial Counsel for Petitioner*

Scott Cole  
Lissette M. Gonzalez  
COLE, SCOTT & KISSANE  
9150 South Dadeland Boulevard  
Suite 1400  
Miami, FL 33156-7855  
*Scott.Cole@csklegal.com*  
*Lissette.Gonzalez@csklegal.com*

Mark D. Tinker, Esq.  
COLE, SCOTT & KISSANE  
4301 West Boy Scout Blvd.  
Suite 400  
Tampa, FL 33607  
*Mark.Tinker@csklegal.com*  
*Kathryn.Lopez@csklegal.com*  
*Charo.Fagundez@csklegal.com*

*Counsel for Respondent*

*/s/ Charles F. Beall, Jr.*  
Charles F. Beall, Jr.