

**IN THE SUPREME COURT OF FLORIDA**

GUARDIANSHIP OF JACQUELYN  
ANNE FAIRCLOTH,

Petitioner,

v.

MAIN STREET ENTERTAINMENT,  
INC., d/b/a POTBELLYS,

Respondent.

---

Case No. SC22-910

L.T. Nos. 1D19-4058  
2015 CA 002778

**UNOPPOSED MOTION TO EXTEND  
TIME TO FILE REPLY BRIEF**

Petitioner moves the Court to extend the time to file its reply brief by eleven days, through June 5, 2023. As grounds for this motion, undersigned counsel states that as follows:

On April 25, 2023, Respondent served its answer brief. By rule, the reply brief is due to be filed on May 25, 2023.

On April 26, 2023, undersigned counsel returned from an out-of-town professional meeting with COVID-19. Counsel was obliged to quarantine at home for several days, away from the office, which delayed counsel's work on the reply brief and other matters. Counsel

fully recovered and is actively working on the reply brief but needs some additional time to fulfill this responsibility.

Counsel his authorized to represent that he has communicated with his opponent, Raoul Cantero, who has no objection to the relief sought herein.

WHEREFORE, undersigned counsel prays for an order extending the time in which to file the reply brief to June 5, 2023.

**CERTIFICATE OF SERVICE**

I CERTIFY that a true copy of the foregoing has been sent by electronic mail to Clerk of Court and to all counsel on the attached list this 22d day of May, 2023.

/s/ David J. Sales  
David J. Sales, Esq.  
FBN 794732  
DAVID J. SALES, P.A.  
1857 Morrill Street  
Sarasota, FL 34236  
Telephone: 941-957-0888  
david@salesappeals.com  
Attorney for Petitioner

## ATTORNEY LIST

### Attorneys for Petitioner

Donald M. Hinkle  
HINKLE.LAW  
3520 Thomasville Rd., Ste 501  
Tallahassee, FL 32309  
[don@hinkle.law](mailto:don@hinkle.law)  
[leslie@hinkle.law](mailto:leslie@hinkle.law)  
[rachel@hinkle.law](mailto:rachel@hinkle.law)

Mark Avera  
Avera & Smith, LLP  
2814 SW 13<sup>th</sup> Street  
Gainesville, FL 32608  
[mavera@avera.com](mailto:mavera@avera.com)  
[maaservice@avera.com](mailto:maaservice@avera.com)

### Attorneys for Amici Curiae

Kenneth B. Bell, Esq.  
Gunster Yoakley & Stewart, P.A.  
215 South Monroe Street,  
Suite 601  
Tallahassee, Florida 32301  
[kbell@gunster.com](mailto:kbell@gunster.com)

William J. Schifino, Esq.  
John A. Schifino, Esq.  
Gunster Yoakley & Stewart, P.A.  
401 East Jackson St., Suite 2500  
Tampa, Florida 33602  
[wschifino@gunster.com](mailto:wschifino@gunster.com)  
[jschifino@gunster.com](mailto:jschifino@gunster.com)

### Attorneys for Respondent

Raoul G. Cantero  
David P. Draigh  
WHITE & CASE  
Southeast Financial Center  
200 S. Biscayne Blvd.  
Suite 4900  
Miami, Florida 33131  
[rcantero@whitecase.com](mailto:rcantero@whitecase.com)  
[ddraigh@whitecase.com](mailto:ddraigh@whitecase.com)

Angela Flowers  
KUBICKI DRAPER  
101 SW 3rd Street  
Ocala, Florida 34471  
[AF-KD@kubickidraper.com](mailto:AF-KD@kubickidraper.com)

Brian Chojnowski  
Michael J. Carney  
Kubicki Draper  
1705 Metropolitan Blvd.  
Suite 202  
Tallahassee, FL 32308-7750  
[SP-KD@kubickidraper.com](mailto:SP-KD@kubickidraper.com)  
[MJC-KD@kubickidraper.com](mailto:MJC-KD@kubickidraper.com)

Rohom Khonsari  
Khonsari Law Group  
2438 Dr. MLK Jr. St. N.  
St. Petersburg, FL 33704  
[rohom@klgflorida.com](mailto:rohom@klgflorida.com)  
[erica@klgflorida.com](mailto:erica@klgflorida.com)  
[marisa@klgflorida.com](mailto:marisa@klgflorida.com)