

IN THE DISTRICT COURT OF APPEAL FOR THE STATE OF FLORIDA
THIRD DISTRICT

DCA CASE NO.: 3D23-1521

LOWER COURT CASE NO.: 18-CA-10783

STAR LAKES ASSOCIATION, INC.,

Appellant,

v.

SOUTHERN COATINGS, INC.,

Appellee.

On Appeal from the Circuit
Court in and for Miami-Dade
County, Florida

APPELLEE'S OBJECTION TO COUNSEL FOR APPELLANT'S MOTION
TO WITHDRAW AND ATTENDANT MOTION TO STAY AND/OR FOR A
THIRD EXTENSION OF TIME TO FILE AND SERVE INITIAL BRIEF

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Appellee, SOUTHERN COATINGS, INC., by and through its undersigned counsel hereby objects to the counsel for Appellant, STAR LAKES ASSOCIATION, INC.’S Motion to Withdraw and Attendant Motion to Stay and/or for a Third Extension of Time to File and Serve Initial Brief for the reasons set forth below:

1. This is a dilatory tactic. Appellant’s counsel knew about all of the issues referenced in its Exhibit “A” during the course of this Appeal. They are now seeking a **third extension of time to file an Initial Brief in conjunction with this matter.**

2. Appellee is being substantially prejudiced as a result of this dilatory conduct. Notably, Appellant’s counsel was terminated on December 8th, 2023 but waited until December 27th, 2023 to file this Motion!

3. Appellee suggests that this Court not grant any extension of time but in fact *sua sponte* dismiss the Appeal accordingly.

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foreign has been served via e-mail to Ronnie Bronstein, Esq., and Robert J. Mansen, Esq., at Mansfield Bronstein & Stone, LLP, litigation@mblawpa.com, on this 29th day of December, 2023.

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