

IN THE DISTRICT COURT OF APPEAL
STATE OF FLORIDA
THIRD DISTRICT

CASE NO.: 3D23-2116

L.T. CASE NO.: 22-11625

PAJ INVESTMENT GROUP, LLC.,

Appellant,

vs.

EL LAGO N.W. 7TH CONDOMINIUM
ASSOCIATION, INC.,

Appellee.

_____/

**APPELLEE'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE TO APPELLANT'S MOTION FOR REHEARING,
REHEARING *EN BANC* OR, IN THE ALTERNATIVE, MOTION FOR
CERTIFICATION**

Appellee, EL LAGO N.W. 7TH CONDOMINIUM ASSOCIATION, INC.,
by and through undersigned counsel, respectfully requests an enlargement
of time of twenty (20) days within which to serve its Response to
Appellant's Motion for Rehearing, Rehearing *En Banc* or, In The
Alternative, Motion for Certification, and in support states as follows:

1. On October 31, 2024, 2022, Appellant filed its 28-page
(excluding exhibits) Motion for Rehearing, Rehearing *En Banc* or, In the
Alternative, Motion for Certification.

2. This Motion implicates complex issues of law and due to impending deadlines in other appellate and trial matters, the undersigned has not had sufficient time to complete the preparation of the Response to the Motion. Thus, despite best efforts, the undersigned is unable to complete the Response by the present due date.

3. Accordingly, Respondent respectfully requests an extension of time of twenty (20) days through and including December 5, 2024, within which to serve its Response to the Motion. However, the undersigned will endeavor to file the Response before this date.

4. This request is made in good faith and not for purposes of delay and no prejudice will be suffered by the granting of this motion.

5. As required by Rule 9.300(a), Florida Rules of Appellate Procedure, on November 18, 2024, undersigned counsel's office sent email correspondence to Alvin Davis, counsel for Appellant, requesting the extension of time, and may represent to the Court that Appellant does not oppose the requested relief.

Certificate of Service

WE HEREBY CERTIFY that a true and correct copy of the foregoing has been filed via the Florida Courts E-Filing Portal and furnished via

electronic mail to all counsel of record, as shown on the attached Service List, this 19th day of November 2024.

**LUKS, SANTANIELLO, PETRILLO,
COHEN & PETERFRIEND**

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