

IN THE THIRD DISTRICT COURT OF APPEAL
OF FLORIDA
THIRD DISTRICT

MANNY ALMANZAR,
Appellant,

CASE NO. 3D2024-0837
LT Case No. 2022-005812 CA 01

V.

MIAMI-DADE COUNTY, et al.,
Appellees.

**Appellant's Motion for
Extension of Time to File Initial Brief**

Submitted by:

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COMES NOW, the Appellant, Manny Almanzar, by and through counsel and pursuant to rules 9.210 and 9.300 of the Florida Rules of Appellate Procedure, and hereby moves the Court for an extension of the time to file his Initial Brief, and states:

1. Appellant's Initial Brief currently is due on October 29, 2024.
2. Appellant's counsel is working diligently on the Initial Brief but requires an extension of the deadline for filing because he is preparing for trial set for the three-week trial calendar beginning October 28, 2024.
3. Appellant seeks a further 30-day extension, until November 28, 2024.
4. Counsel for M&S Heavy Equipment have advised that they do not oppose the relief sought in the instant Motion; counsel for Miami-Dade County, Jackson Memorial Hospital, and The Public Health Trust of Miami-Dade County have been contacted but have not provided their position on this Motion.

WHEREFORE, in light of the foregoing, the Appellant, Manny Almanzar, respectfully requests that this Honorable Court enter an Order extending by 30 additional days the time within which to file the Initial Brief, along with all other relief the Court deems proper and just.

Certification of Conferral

WE HEREBY CERTIFY that we have attempted to confer with counsel for the Appellees. Counsel for M&S Heavy Equipment have advised that they do not oppose the relief sought in the instant Motion; counsel for Miami-Dade County, Jackson Memorial Hospital, and The Public Health Trust of Miami-Dade County have been contacted but have not provided their position on this Motion.

October 28, 2024.

Respectfully submitted,

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Certificate of Service

I HEREBY CERTIFY that this Motion for Extension of Time was filed this 28th day of October, 2024, via Florida Courts E-Filing Portal and thereby served on:

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