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## Case No. SC01-323 graps

VERIZON FLORIDA INC.,	HAMERO
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Appellant,

v. : nn1556-TL

E. LEON JACOBS, JR., et al.,

Appellees.

## APPELLANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME FOR THE SERVICE OF APPELLANT'S REPLY BRIEF

Appellant, Verizon Florida Inc., by and through its undersigned counsel and pursuant to Florida Rule of Appellate Procedure 9.300, hereby moves this Court for a 20 day extension of time for the service of the Reply Brief herein. In support of this motion, Appellant states:

- 1. Appellees served an Answer Brief by U.S. Mail on or about May 21, 2001. Accordingly, Appellant's Reply Brief is due to be served on or before June 15, 2001. If this motion is granted, the Reply Brief will be due to be served on or before July 5, 2001.
- 2. The undersigned appellate counsel has a previously scheduled vacation out of the country that will make it difficult to comply with this due date. Moreover, Appellant's in-house counsel, Ms. Caswell, has a congested calendar that includes hearing dates during the interim in which the Reply Brief would need to be prepared.

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An extension will allow the undersigned and Ms. Caswell, counsel most familiar with the issues on appeal, adequate time to prepare a cogent, concise reply.

3. The slight delay occasioned by this extension will not cause prejudice to any party. Indeed, the undersigned counsel certifies that counsel for Appellees and counsel for amicus curiae both have stated that they have no objection to this requested extension. The undersigned further certifies that this motion is brought in good faith and not for any improper purpose.

Wherefore, Appellant respectfully requests this Court grant Appellant an additional 20 days in which to serve the Reply Brief.

Respectfully submitted,

Marvin E. Barkin

Florida Bar No. 003564

Marie Tomassi

Florida Bar No. 0772062

TRENAM, KEMKER, SCHARF, BARKIN,

FRYE, O'NEILL & MULLIS, P.A.

450 Carillon Parkway, Suite 120

St. Petersburg, Florida 33716

(727) 898-7474

and

Kimberly Caswell, Esquire Florida Bar No. 874310 Post Office Box 110, FLTC0007 Tampa, Florida 33601-0110 (813) 483-2617

Attorneys for Verizon Florida Inc.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Appellant's Unopposed Motion for Extension of Time for the Service of Appellant's Reply Brief has been furnished, by U.S. Mail, to

Christiana T. Moore, on behalf of the Commission Staff **Public Service Commission** 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Blanca S. Bayo', Director Division of Records and Reporting **Public Service Commission** 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Raoul G. Cantero, III Adorno & Zeder, P.A. 2601 South Bayshore Drive, Suite 1600 Miami, FL 33133

on May 29, 2001.

Attorney