

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by the Town of Indian
River Shores For Modification of
Territorial Order Based on Changed
Legal Circumstances Emanating
From Article VIII, Section 2(c) of
the Florida Constitution.

Docket No.: 160049-EU

Date: March 25, 2016

**TOWN OF INDIAN RIVER SHORES' UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO FILE A RESPONSE TO THE CITY OF VERO BEACH'S MOTION TO
DISMISS INDIAN RIVER SHORES' PETITION FOR MODIFICATION OF
TERRITORIAL ORDER AND ALTERNATIVE COMPLAINT**

The Town of Indian River Shores (the "Town"), by and through undersigned counsel, requests an enlargement of time to April 7, 2016 to file its response in opposition to the Motion to Dismiss the Town of Indian River Shores' Petition for Modification of Territorial Order and Alternative Complaint filed by the City of Vero Beach (the "City"). The undersigned counsel has discussed this requested enlargement of time with counsel for the City and is authorized to represent that the City does not oppose the request. In support of its unopposed motion, the Town states:

1. On March 4, 2015, the Town filed its Petition for Modification of Territorial Order based on Changed Legal Circumstances Emanating from Article VIII, Section 2(c) of the Florida Constitution.
2. On March 24, 2016, the City filed a 75 page Motion to Dismiss and Alternative Complaint which was accompanied by a motion to intervene (the "Motion to Dismiss"). Under Rule 28-106.204, Florida Administrative Code, the Town's response to the City's Motion to Dismiss would be due March 31, 2016.
3. Within the response period currently provided, counsel for the Town will not have adequate time to respond to the City's Motion to Dismiss, and thus is requesting a one-week

extension of time. Accordingly, the Town requests that the Commission grant an enlargement of time through April 7, 2016 for filing of its response in opposition to the City's Motion to Dismiss.

WHEREFORE, the Town of Indian River Shores respectfully requests that the Commission enlarge the time within which it may file its response in opposition to the City's Motion to Dismiss through April 7, 2016.

Respectfully submitted this 25th day of March, 2016.

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was provided by electronic mail this

25th day of March, 2016 to the following:

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