## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for certificate to provide wastewater service in Charlotte County, by Environmental Utilities, LLC

DOCKET NO. 20200226-WS

## PALM ISLAND ESTATES ASSOCIATION, INC.'S AGREED MOTION FOR ENLARGEMENT OF TIME

Party of Record, PALM ISLAND ESTATES ASSOCIATION, INC., files this Agreed Motion for Enlargement of Time to respond to Petitioner's Motion for Final Partial Summary Order, and states as follows:

- 1. Undersigned counsel has been out of the office attending to personal matters for four consecutive days since service of Petitioner's Motion for Final Partial Summary Order, making it impossible to timely respond to the motion.
- 2. In addition, the undersigned has been handling a robust caseload during the seven day period (prior to the time-off referenced in Paragraph 1) to respond to the motion pursuant to F.A.C. 28-106.204, with hearings, depositions, mediations and arbitrations that have further made it not possible to fully and completely respond to the motion.
- 3. Undersigned counsel contacted counsel for Petitioner who has no objection to the relief requested herein and has agreed that Party of Record, PALM ISLAND ESTATES ASSOCIATION, INC., be given until August 26, 2021 within which to serve a response to the motion.
- 4. Having established good cause with the agreement of opposing counsel, PALM ISLAND ESTATES ASSOCIATION, INC., respectfully requests an extension up through and including August 26, 2021 within which to respond to the partial summary order motion filed by Environmental Utilities, LLC.

WHEREFORE, Party of Record, PALM ISLAND ESTATES ASSOCIATION, INC., requests the relief set forth herein and for any other relief that is just, equitable and proper.

Dated this 15th day of August 2021.

KELSKY LAW, P.A. Counsel for Palm Island Estates Association, Inc. 150 S. Pine Island Road Suite 300 Plantation, FL 33324 954.449.1400 Fax: 954.449.8986

Primary: <u>bradkelsky@kelskylaw.com</u> Secondary: <u>barbarallinas@kelskylaw.com</u>

BY: /s/ Brad E. Kelsky

BRAD E. KELSKY FBN: 0059307

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was emailed this 14th

day of August 2021 to:

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