

No. 19-5437

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In The
Supreme Court of the United States

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EKATERINI ALEXOPOULOS
Petitioner,

vs.

STEVEN GOLDSMITH P.A.,
and STEVEN M. GOLDSMITH,
Respondents.

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Petition For Writ Of Certiorari
To The District Court Of Appeal
Fourth District, Florida

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RESPONDENTS' SECOND APPLICATION FOR EXTENSION OF TIME TO
RESPOND TO PETITION FOR WRIT OF CERTIORARI TO THE SUPREME
COURT OF THE UNITED STATES

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DIRAN V. SEROPIAN, ESQ.

Florida Bar No. 773476

SHENDELL & POLLOCK, P.L.

2700 N. Military Trail, Suite 150

Boca Raton, Florida 3341

(561) 241-2323 – Telephone

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ATTORNEYS FOR RESPONDENTS, STEVEN GOLDSMITH P.A.,
and STEVEN M. GOLDSMITH

=====

Pursuant to this Court's Rule 30.3, STEVEN GOLDSMITH, P.A. and STEVEN M. GOLDSMITH, ("Respondents"), respectfully requests a seven (7) day extension of time, up to and including October 18, 2019, within which to file a response to the petition for writ of certiorari (the "Petition") filed by, EKATERINI ALEXOPOULOS ("Petitioner"), in this case. As directed by the Court, the time for Respondents to file a response to the petition currently expires on October 11, 2019.

1. Petitioner's petition for a writ of certiorari was filed on May 7, 2019 and placed on the docket August 2, 2019.

2. By rule, a response to the petition was due on or before September 3, 2019.

3. On August 22, 2019, Respondents requested by correspondence, an extension of time to file a response to the petition. The court granted the request, extending the time to respond to the petition to October 3, 2019.

4. On September 27, 2019, Respondents filed their Application for Extension of Time to Respond to Petition for Writ of Certiorari. The court granted the application, extending the response time to October 11, 2019.

5. Due to the undersigned's heavy litigation schedule, other professional responsibilities, and the intervening Jewish Holy Day which directly affected this law firm, counsel for the Respondents requests an extension of time of seven (7) days from October 11, 2019, within which to prepare and file a response to the petition, to wit: on or before October 18, 2019.

6. The undersigned counsel certifies that Lysa Friedlieb, Esq., and his law firm's staff have attempted to confer with Petitioner multiple times by telephone and email, regarding the requested extension. However, Petitioner has chosen not to respond to any of the repeated attempts to confer. See attached **Exhibit "A"**.

7. For the reasons stated above, Respondents respectfully requests the time to file a response to the petition in this case be extended seven (7) days up to and including October 18, 2019.

8. Considering the issues on appeal do not involve deprivation of liberty, it is respectfully submitted that Petitioner would not be prejudiced by this short extension to prepare and file the Brief in Opposition.

WHEREFORE, Respondents, STEVEN GOLDSMITH, P.A. and STEVEN M. GOLDSMITH, respectfully request this Honorable Court grant the relief requested herein and for such other and further relief as the Court deems just and proper.

Dated this 10th day of October, 2019.

Respectfully submitted,

SHENDELL & POLLOCK, P.L.
Attorneys for Respondents
2700 North Military Trail, Suite 150
Boca Raton, Florida 33487
(561) 241-2323 Telephone
(561) 241-2330 Facsimile

By: s/Diran V. Seropian

Diran V. Seropian, Esq.
Florida Bar No. 00773476
diran@shendellpollock.com
britt@shendellpollock.com
grs@shendellpollock.com

Brittney Spiliotopoulos

From: Brittney Spiliotopoulos
Sent: Wednesday, October 09, 2019 2:52 PM
To: alexopoulos5@aol.com
Cc: Lysa Friedlieb
Subject: RE: E. Alexopoulos v. S. Goldsmith - second request for additional extension of time

Tracking:

Recipient

Delivery

alexopoulos5@aol.com

Lysa Friedlieb

Diran Seropian

Delivered: 10/9/2019 2:52 PM

Delivered: 10/9/2019 2:52 PM

Good afternoon Ms. Alexopoulos,

Ms. Friedlieb asked that I follow up with you regarding the additional extension of time to respond to your writ of certiorari we have been seeking in this matter.

I called your cell phone at 561-906-7245 at 1:30 pm and was told by the gentleman who answered I had the wrong number. Keep in mind, this is the same cell phone number we have had for you since inception of this matter, so we are at a loss as to how we have the wrong phone number. When I attempted the number again at 1:42 pm, it rang twice, was answered and was hung up. I then, tried your home telephone number which went to a voice message. I was unable to leave you a message due to the memory being full.

Since we need to advise court of your position in our submission, please let us know if you agree with the additional extension of time to respond to your writ of certiorari up to and including October 18, 2019 at your earliest opportunity.

Thank you.

Brittney M. Spiliotopoulos | Legal Assistant

Florida • New Jersey • New York

britt@shendellpollock.com

Tel: 561-241-2323

Toll Free: 1-844-511-2323

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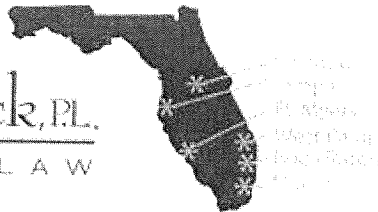


EXHIBIT A

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Brittney Spiliotopoulos

From: Mail Delivery System <MAILER-DAEMON@dispatch1-us1.ppe-hosted.com>
To: alexopoulos5@aol.com
Sent: Wednesday, October 09, 2019 2:52 PM
Subject: Relayed: E. Alexopoulos v. S. Goldsmith - second request for additional extension of time

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

alexopoulos5@aol.com

Subject: RE: E. Alexopoulos v. S. Goldsmith - second request for additional extension of time

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From: Lysa Friedlieb
Sent: Monday, October 07, 2019 10:54 AM
To: alexopoulos5@aol.com
Subject: RE: E. Alexopolous v. S. Goldsmith - second request for 1 week extension of time

Good Morning Ms. Alexopoulos,

I hope you had a good weekend.

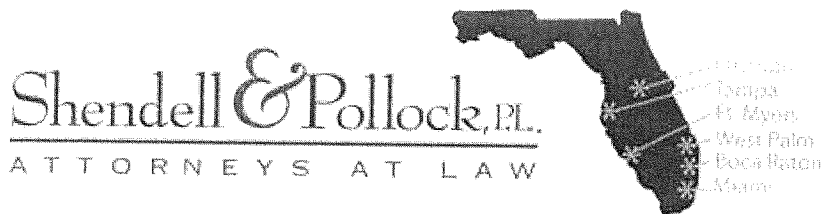
I left you a voice mail today, at 10:50 am, seeking a second extension of time to file a response to the Writ of Certiorari. Your home number voice mail box is full, so I left you a voice mail message on your cell phone.

Given that I will be observing the Jewish High Holiday of Yom Kippur, we are requesting a second extension of time up to and through October 18, 2019.

We look forward to hearing from you.

Regards,
Lysa Friedlieb

Lysa Friedlieb | Attorney
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From: Lysa Friedlieb
Sent: Friday, October 04, 2019 12:41 PM
To: 'alexopoulos5@aol.com' <alexopoulos5@aol.com>
Subject: RE: E. Alexopolous v. S. Goldsmith - second request for 1 week extension of time

Good Afternoon Ms. Alexopoulos,

We spoke a week or so ago; I hope you are well.

I am requesting a second 1 week extension of time up to and through October 18, 2019 for Respondent Goldsmith to file its response to your Writ of Certiorari.

I apologize for not knowing when I asked for the extension that Yom Kippur starts on the eve of October 8, 2019; I will be observing Yom Kippur and will be in temple Tuesday evening through Wednesday late afternoon. Given same I won't be in the office until October 10, 2019.

As such I am requesting another 1 week extension up to and through October 18, 2019; I did try and contact you at your home number, but your answering machine message was full.

Regards,

Lysa

Lysa Friedlieb | Attorney
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From: alexopoulos5@aol.com [<mailto:alexopoulos5@aol.com>]
Sent: Thursday, September 26, 2019 2:21 PM
To: Lysa Friedlieb <lysa@shendellpollock.com>
Subject: Re: E. Alexopolous v. S. Goldsmith - request for 1 week extension of time

I agree to your request for an extension of time up to October 11, 2019.
Kathy Alexopoulos

-----Original Message-----

From: Lysa Friedlieb <lysa@shendellpollock.com>
To: alexopoulos5@aol.com <alexopoulos5@aol.com>
Cc: Brittney Spiliotopoulos <Britt@shendellpollock.com>; filing <Filing@shendellpollock.com>
Sent: Thu, Sep 26, 2019 1:50 pm
Subject: E. Alexopolous v. S. Goldsmith - request for 1 week extension of time

Good Afternoon Ms. Alexpoloulos,

My name is Lysa Friedlieb. I left you a voice mail at about 1:45 pm on your home number; we are seeking a 1 week extension to respond to the Writ of Certiorari; currently the response is due on 10.3.19 and we are seeking up to and through 10.11.19 to file the response to the aforementioned Writ.

Thank you for your prompt response; if you have any questions, please contact me at 561.241.2323.

Regards,

Lysa Friedlieb

Lysa Friedlieb | Attorney

Florida New Jersey New York

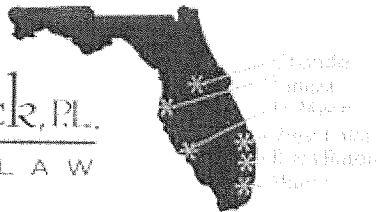
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