

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Complainant,

Supreme Court Case No.:
SC18-1614

v.

CHRISTOPHER M. CHESTNUT,

The Florida Bar File Nos.
2017-00,372(4D), 2018-
00,372(4B), 2018-00,441(4C),
2018-00,481 (4D)

Respondent.

_____ /

**RESPONDENT’S MOTION FOR A 90-DAY EXTENSION TO FILE
INITIAL BRIEF**

COMES NOW, Respondent, CHRISTOPHER CHESTNUT, pro se, and hereby petitions this Honorable Court pursuant to *Fla. R. App. P.* § 9.210 and Rule 3-7.7 of Rules Regulating The Florida Bar, for a ninety (90) day extension of the deadline to file a brief in support of the Notice of Intent to Seek Review, and states as follows:

SUMMARY OF MOTION

Respondent respectfully petitions this Honorable Court for a ninety (90) day extension to file a brief in SC18-1614. Respondent herein proffers as good cause

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that he is actively seeking appellate counsel and has not secured appellate counsel to date due to extenuating circumstances, emanating from a recent disbarment by The Florida Bar.

FACTS / CHRONOLOGY

1. On or about May 30, 2019 the Referee in this case filed the Report of Referee.
2. On or about June 13, 2019 Respondent timely filed a Notice to Intent to Seek Review in SC18-1614.
3. On May 3, 2019 The Supreme Court of Florida entered an order disbaring respondent from the practice of law, providing him 30 days to wind down his law practice.
4. Respondent has been working to wind down his law practice.
5. Respondent intends to retain an appellate attorney to litigate this appeal but has not been able to secure an appellate attorney to date.

LEGAL AUTHORITY & ARGUMENT

Respondent has (30) thirty days from the June 13, 2019 filing of the Notice of Intent to Seek Review to timely file a brief unless an extension is obtained by court upon the showing of good cause. *See, Rules Regulating The Florida Bar*, Rule 3-7.7(c)(3); *see also, Martin v. Martin*, 118 So. 2d 649 (Fla. 1960). In the case *sub judice*, Respondent is no longer licensed to practice law, no longer has a law firm

and no longer has the resources to file or litigate an appeal independently; therefore, an appellate attorney is necessary to represent Respondent in this appeal.

Respondent proffers as good cause in seeking this extension that he is actively seeking appellate counsel to represent him in this appeal for SC18-1614. An appellate court will decline to dismiss the appeal and allow the late filing of an appellate brief when good cause is shown for the delay. *Parada Holding Co. v. Sulkin*, 126 So. 2d, 601 (Fla. 3rd DCA 1961). Respondent has been delayed in retaining counsel because he has been preoccupied with the onerous process of winding down his practice.

Additionally, Respondent has been trying to secure the proper monetary resources to retain appellate counsel considering the recent closing of his law practice. Even after retaining appellate counsel, she/he will require sufficient time to review the voluminous record and to prepare the appeal, thus the ninety (90) days requested. Respondent avers that good cause has been demonstrated for this extension and this is the first extension requested by Respondent in this appeal.

WHEREFORE, based upon the aforementioned facts, good cause shown, legal authority, and legal argument, Respondent petitions this Honorable Court to extend the deadline for ninety (90) calendar days from the due date of the initial filing.

Respectfully submitted this 9th day of July ,2019.

By: /s/ Christopher M. Chestnut
CHRISTOPHER M. CHESTNUT

CERTIFICATE OF COMPLIANCE

I HERBY CERTIFY that this brief was generated in Times New Roman 14 pt., and satisfies the font requirements of *Fla. R. App. P. § 9.210(a)(2)*.

By: /s/ Christopher M. Chestnut
CHRISTOPHER M. CHESTNUT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of July, 2019 the foregoing was electronically served upon the following counsel of record, I certify that copies were supplied to to Carlos A. Leon at cleon@flabar.org, and Adria E. Quintela, Staff Counsel, The Florida Bar at aquintel@flabar.org, and service via the Florida E-filing system.

By: /s/ Christopher M. Chestnut
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