

FILED
2011 SEP 22 AM 9:25
BY

IN THE SUPREME COURT OF FLORIDA

Case No. SC11-1737

WILLIAM TELLI

Petitioner,

v.

BROWARD COUNTY AND
DR. BRENDA C. SNIPES

Respondents.

**PETITIONER'S UNOPPOSED MOTION TO ACCEPT THE
SEPTEMBER 19, 2011, CORRECTED AMENDED BRIEF IN
SUPPORT OF JURISDICTION**

Petitioner, WILLIAM TELLI, hereby moves this honorable court to accept his September 19, 2011, Corrected Amended Brief in Support of Jurisdiction in replace of his previously filed Amended Brief in Support of Jurisdiction and states:

1) On September 9, 2011, this Court issued an order striking Petitioner's jurisdictional brief for failure to include a summary of argument as required by Florida Rule of Appellate Procedure 9.210.

2) On September 13, 2011, Petitioner filed an Amended Brief in Support of Jurisdiction including the required section titled "Summary of Argument".

3) Due to a death in the family, the undersigned was out of the office from September 12, 2011, through September 16, 2011, and was unable to review the amended brief prior to filing. Upon returning to the office on September 19, 2011, the undersigned discovered some minor formatting issues in both the body and table of authorities of the amended brief. In an abundance of caution, on September 19, 2011, Petitioner served by mail a Corrected Amended Brief in Support of Jurisdiction, which was received by this Court on September 20, 2011, a full nine days before the brief was due pursuant to the Court's September 9, 2011, Order.

4) Petitioner respectfully requests that this Court enter an order accepting the timely filed Corrected Amended Brief in Support of Jurisdiction in replace of his previously filed Amended Brief in Support of Jurisdiction.

5) The undersigned has spoken with counsel for both Respondents and has been authorized to represent that Respondents have no objection to the relief requested in this motion.

WHEREFORE PETITIONER, WILLIAM TELLI, respectfully requests that this honorable court accept his timely filed September 19, 2011, Corrected Amended Brief in Support of Jurisdiction in replace of his previously filed Amended Brief in Support of Jurisdiction.

CERTIFICATE OF SERVICE

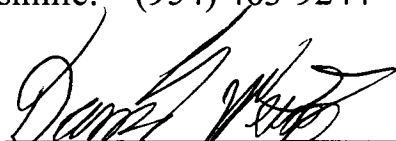
WE HEREBY CERTIFY that a true copy of the foregoing was via U.S. Mail, to all counsel on the attached Mailing List on this 21st day of September, 2011.

CERTIFICATE OF TYPE SIZE AND STYLE

The undersigned counsel certifies that the type and style used in this brief is 14 point Times New Roman.

CONRAD & SCHERER, LLP
Counsel for Petitioner
633 South Federal Highway
Fort Lauderdale, FL 33301
Telephone: (954) 462-5500
Facsimile: (954) 463-9244

By:



WILLIAM R. SCHERER
Florida Bar No. 169454
DANIEL S. WEINGER
Florida Bar No. 172900
ERIC J. RAYMAN
Florida Bar No. 21947

-and-

BRUCE S. ROGOW
Florida Bar No. 067999
500 E. Broward Blvd. - Suite 1930
Fort Lauderdale, FL 33394
Telephone: (954) 767-8909
Facsimile: (954) 764-1530

MAILING LIST

Joni Armstrong Coffey, Esq.
Attorney for Respondents
Broward County Attorney
Government Center, Suite 423
115 South Andrews Avenue
Fort Lauderdale, FL 33301
(954) 357-7600 Telephone
(954) 357-7641 Facsimile

Andrew J. Myers, Esq.
Chief Appellate Counsel
Attorney for Respondents
Government Center, Suite 423
115 South Andrews Avenue
Fort Lauderdale, FL 33301
(954) 357-7600 Telephone
(954) 357-7641 Facsimile

Benjamin R. Salzillo, Esq.
Annika E. Ashton, Esq.
Attorney for Respondents
Government Center, Suite 423
115 South Andrews Avenue
Fort Lauderdale, FL 33301
(954) 357-7600 Telephone
(954) 357-7641 Facsimile

Burnadette Norris-Weeks, Esq.
Co-Counsel for Dr. Brenda C. Snipes
401 North Avenue of the Arts
Fort Lauderdale, Florida 33311
(954) 768-9770 Telephone
(954) 768-9790 Facsimile