

**IN THE DISTRICT COURT OF APPEAL
FOURTH DISTRICT, STATE OF FLORIDA**

CASE NO.: 4D16-0444

LOWER TRIBUNAL NO.: 502013CA012409XXXXMB

SKENDER & BEBA HOTI,

APPELLANT,

**Motion to Accept Late
Filing; Notice of Correction**

V.

DAVID GARTEN,

APPELLEE.

COMES NOW, Skender Hoti, Appellant herein, who respectfully prays and shows this court as follows:

1. I am the Appellant in this case.
2. I make this motion for this Court to accept my late filing of my Reply Brief and for a Notice of Correction.
3. This Court allowed a 30 day extension of time for filing and service of my Reply brief by an Order dated Aug. 25, 2016.

4. Thirty days from this date would have been Sept. 24, 2016, a non-working weekend day and thus, Monday, Sept. 26, 2016 would have been the next business day to file.
5. Because of internet and computer issues, my filing was made to this Court at 1:21 a.m. EST on Sept. 27, 2016, less than an hour and a half past the midnight deadline.
6. I now move this Court to accept this late filing and deem my Reply timely.
7. Also, as a Notice of Correction, on Page 6 under the Statement of the Case and Facts section, second sentence on this page, it should be Corrected to “but the Record is also devoid to show the Appellants were insolvent at any time herein and thus, Appellants have been solvent at all times in these proceedings.”
8. This will correct the mis-typed statement therein.

WHEREFORE, it is respectfully prayed for an Order deeming the filing of my Reply Brief timely and accepted by this Court and correcting the other statement in the brief therein and for such other and further relief as may be just and proper.

Dated: Sept. 27, 2016

Respectfully submitted,

/s/ Skender Hoti
Skender Hoti

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been served via email to dfitzgerald@waltonlantaff.com on Walton Lantaff Schroeder & Carson LLP 110 E. Broward Blvd. Suite 2000 Fort Lauderdale, Fl 33301-3503 on this 27th day of September, 2016.

/s/ Skender Hoti

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