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IN THE SUPREME COURT OF FLORIDA

CASE NO. SC11-1446
Lower Tribunal No. F90-48092-B

ANA MARIA CARDONA,

Appellant,

vs.

STATE OF FLORIDA,

Appellee.
_____/

MOTION TO ACCEPT INITIAL BRIEF AS TIMELY FILED

The Appellant moves the Court to accept the Initial Brief as timely filed and states:

1. The Initial Brief was due to be filed on January 14, 2014.

2. Despite his best efforts, counsel was unable to submit a complete, competent, and professional brief by that date.

3. Counsel apologizes to the Court. The tardiness in the filing of the brief was not for purposes of delay, but solely because counsel was unable to timely file a brief consistent with his duties to his client and the Court.

4. The undersigned has conferred with counsel for the Appellee, who has authorized him to state that the Appellee takes no position with regard to the disposition of this motion.

WHEREFORE, the Appellant moves that the Court grant this motion and accept the Initial Brief as timely filed.

Respectfully submitted,

CARLOS J. MARTINEZ
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Eleventh Judicial Circuit of Florida
1320 Northwest 14th Street
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By: _____
ANDREW STANTON
Assistant Public Defender
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was served to counsel for the appellee, Sandra Jaggard, Assistant Attorney General, Dept. of Legal affairs, 444 Brickell Ave, Suite #650, Miami, FL 33131 via the Court's e-filing portal on January 29, 2014.

_____
Andrew Stanton