Filing # 12210735 Electronically Filed 04/07/2014 03:38:27 PM

RECEIVED, 4/7/2014 15:43:38, John A. Tomasino, Clerk, Supreme Court

IN THE SUPREME COURT OF FLORIDA

CASE NO. SC11-1446

ANA MARIA CARDONA,

Appellant/Cross-Appellee,

vs.

THE STATE OF FLORIDA,

Appellee/Cross-Appellant.
_____/

MOTION TO ACCEPT OVERSIZED BRIEF

Appellee, THE STATE OF FLORIDA ("State"), hereby moves this Court to accept its 118 page Answer Brief of Appellee/Initial Brief of Cross-Appellant. As grounds, therefore, the State states:

1. The record in this appeal exceeds 21,000 pages. Appellant had filed an issue brief raising nine issues, none of which concern the sufficiency of the evidence or the proportionality of her sentence.

2. The State has filed a cross appeal and is raising two additional issues. The State's also brief responds to Appellant's nine issues and addresses proportionality and sufficiency.

3. Pursuant to Fla. R. App. P. 9.210(a)(5), a cross appellant is permitted to file an 85 page long brief, which exceeds the normal page limit on briefs by 35 pages. Here, the

State's brief only exceeds the page limit for a normal brief by 18 pages.

4. Fla. R. App. Proc. 9.210(a)(5) also gives this Court the discretion to accept a brief that is longer than a standard page limit. Because of the enormous volume of this case, its extraordinary circumstances and the State's cross appeal, the State asks this Court to exercise its discretion and accept this brief.

WHEREFORE, the State respectfully requests that this Court accept its 118 page long brief.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was furnished by email to Andrew Stanton, Assistant Public Defender, astanton@pdmiami.com, 1320 NW 14th Street, Miami, Florida 33125, this 7th day of April, 2014.

\s\Sandra S. Jaggard
SANDRA S. JAGGARD
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