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IN THE SUPREME COURT OF FLORIDA

Case No. SC11-1446

Lower Tribunal No. 98-48092B

ANA MARIA CARDONA,

Appellant,

vs.

STATE OF FLORIDA,

Appellee.
_____/

APPELLANT'S MOTION FOR EXTENSION OF TIME FOR THE FILING OF HER AMENDED BRIEF IN LIGHT OF *HALL V. FLORIDA*

The Appellant moves this Court for a short extension of time for the filing of the amended initial brief in this cause. In support of this motion, the Appellant states:

1. The Court has granted leave to file an amended initial brief. That brief is due to be filed in this Court.

2. On May 27, 2014, the United States Supreme Court decided *Hall v. Florida*, 2014 WL 2178332 (May 27 2014), which invalidated Florida's standard for determining intellectual disability as a bar to execution.

3. That decision has required that counsel reevaluate and raise on appeal the denial of her motion to bar execution on the basis of intellectual disability.

4. Counsel therefore requests an extension of time of 15 days.

5. This motion is made in good faith and not for the purpose of unnecessary delay. The motion is filed based on the firm fact that counsel cannot meet his ethical and constitutional obligations to Ms. Cardona without the requested extension.

6. No further extensions will be requested.

7. Counsel has been contacted opposing counsel pursuant to Rule 9.300(a) of Florida Rules of Appellate Procedure, and has been authorized to state that the Appellee objects to the granting of this motion.

WHEREFORE, the appellant moves the Court to extend the time for filing the initial brief for fifteen days.

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Court's e-filing portal to counsel for the appellee, Sandra Jaggard, Assistant Attorney General, Office of the Attorney General, 444 Brickell Avenue, Suite 950, Miami, FL 33131, at CAPAPP@MYFLORIDALEGAL.COM, on June 3, 2014.

Respectfully submitted,
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By: /s/ Andrew Stanton

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