Filing # 15930069 Electronically Filed 07/15/2014 02:35:02 PM

RECEIVED, 7/15/2014 14:38:42, John A. Tomasino, Clerk, Supreme Court

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 TO ACCEPT THE AMENDED INITIAL BRIEF AS TIMELY FILED

The Appellant moves this Court to accept the amended initial brief as timely filed. In support of this motion, the Appellant states:

1. The Amended Initial Brief was due to be filed in this Court on July 2, 2014.

2. Due to the burdensome caseload of undersigned counsel, it was not possible for undersigned counsel to file a competent brief on behalf of the Appellant by the date on which the brief was due.

3. As the Court is aware, the record on appeal is extensive, consisting of 225 volumes and more than 22,000 pages. Preparation of the amended brief further required review of other documents from the preceding fourteen years of litigation.

4. Undersigned counsel's failure to timely file the amended initial brief was not intentional. Counsel was unable to complete a thorough, competent brief consistent with his duties to the appellant and the Court before this time.

5. Undersigned counsel apologizes to the Court for the inconvenience and delay which has resulted from counsel's failure to timely submit the amended initial brief.

6. Counsel has conferred with counsel for the appellee and is authorized to state that the appellee objects to the granting of this motion.

WHEREFORE, the appellant moves the Court to accept the brief as timely filed.

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 July 15, 2014.

Respectfully submitted,
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