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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 IN WHICH TO FILE REPLY/CROSS-ANSWER BRIEF

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

1. The Reply/Cross-Answer Brief is due to be filed in this Court.

2. Despite the undersigned counsel's diligent efforts, counsel has been unable to complete the Reply/Cross-Answer Brief.

3. The Appellee filed its amended Answer/Cross-Initial Brief on August 7, 2014.

4. At that time, the undersigned counsel was on planned annual leave outside the state of Florida. He did not return until August 18.

5. The record on appeal is extensive, consisting of 225 volumes and more than 22,000 pages.

6. The undersigned counsel finds that he is unable to complete a timely brief that would be consistent with his ethical responsibilities and Ms. Cardona's right to effective assistance of counsel.

7. Counsel will require an additional 30 days in which to complete the Reply/Cross-Answer Brief. This will allow counsel time to complete a competent brief.

8. 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.

9. Pursuant to Rule 9.300(a) of Florida Rules of Appellate Procedure, undersigned counsel has conferred with counsel for Appellee and has been authorized to state that the State objects to the granting of the extension.

WHEREFORE, the appellant moves the Court to extend the time for filing the initial brief by 30 days.

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Court's e-filing portal on counsel for the appellee, Sandra Jaggard, Assistant Attorney General, Office of the Attorney General, 444 Brickell Avenue, Suite 950, Miami, FL 33131, on September 8, 2014.

Respectfully submitted,
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