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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 FINAL 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 reply/cross-answer 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. Counsel is presently in trial in a capital case.

3. The trial is in its third week of jury selection.

4. As a result, counsel has been unable to complete the brief despite diligent efforts.

5. The Appellant requests a final extension of fifteen days in which to complete the brief.

6. The Appellant requests this period of time so that he can use the intervening weekends in which to complete the brief.

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

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 Reply/Cross-Answer Brief by 15 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 October 23, 2014.

Respectfully submitted,
CARLOS J. MARTINEZ
Public Defender
Eleventh Judicial Circuit of Florida
1351 Northwest 12th Street
Miami, Florida 33125
(305) 545-1928

By: /s/ Andrew Stanton
ANDREW STANTON

Assistant Public Defender
Florida Bar No. 0046779
appellatedefender@pdmiami.com
astanton@pdmiami.com