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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 TO ACCEPT THE REPLY/CROSS-ANSWER BRIEF AS TIMELY FILED

The Appellant moves this Court to accept the reply/cross-answer brief as timely filed. In support of this motion, the Appellant states:

1. The reply/cross-answer brief was due to be filed in this Court on December 1, 2014.

2. The undersigned has been in trial on the penalty phase of another capital case in the Eleventh Judicial Circuit, *State v. Rafael Andres*, F05-12648.

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 reply brief was unusually record-intensive.

4. Undersigned counsel's failure to timely file the reply/cross-answer 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 further inconvenience and delay that has resulted from counsel's failure to timely submit the reply/cross-answer brief .

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 December 29, 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