

FLORIDA SUPREME COURT

JAVARRIS LANE,
Appellant,
v.

STATE OF FLORIDA,
Appellee.

CASE NO. SC14-2152

APPELLEE'S FIRST MOTION FOR EXTENSION OF TIME

Pursuant to Florida Rule of Appellate Procedure 9.300, the Appellee, the State of Florida (hereinafter State), moves this Honorable Court for a **10-day** extension of time in which to file its response and in support thereof states:

(1) The State's Response is due on or before July 11, 2016.

(2) As of **July 11, 2016** with a staff of 22 attorneys, the Tallahassee Criminal Appeals Division has **456** briefs or responses due in the next 90 days. In 2015 the Tallahassee Criminal Appeals division was able to file **936** briefs in State or Federal court, **734** responses to orders to show cause in State court and/or responses to orders regarding petitions for writs of mandamus in State Court, and **233** responses to petitions for writ of habeas corpus in federal court and participated in at least 46 oral arguments. The Tallahassee Criminal Appeals Bureau is employing every means possible to work more efficiently, but it is doubtful it can be much more productive.

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(3) Undersigned has Oral Argument on John McDonald (1D14-4458) with the First District Court of Appeals at 2:00pm. This case involves six issues that have to be addressed.

(4) The State has consulted with opposing counsel, Glen Gifford, Esquire, who has no objection to this extension of time.

(5) Appellant is incarcerated in the case.

(6) This request is made in good faith and not for the purpose of unnecessary delay and will not unduly prejudice the rights of appellant.

WHEREFORE, the State respectfully requests that this Honorable Court grant it a 10-day extension of time in which to file its Response to include July 22, 2016.

Respectfully submitted,
Pamela Jo Bondi
ATTORNEY GENERAL

/s/ Virginia Harris
Virginia Harris
Criminal Appeals
ASSISTANT ATTORNEY GENERAL
FLORIDA BAR NO. 0706221
OFFICE OF THE ATTORNEY GENERAL
THE CAPITOL
TALLAHASSEE, FL 32399-1050
(850) 414-3300

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing APPELLEE'S MOTION FOR EXTENSION OF TIME has been furnished by Electronic Mail; Glen Gifford Esquire @ glen.gifford@flpd2.com, this 12th day of July, 2016.

/s/ Virginia Harris
Virginia Harris
Assistant Attorney General