

IN THE SUPREME COURT OF FLORIDA

WILLIAM WILLIAMS,

Petitioner,

v.

CASE NO. SC15-1417

STATE OF FLORIDA,

Respondent.

_____/

MOTION FOR EXTENSION OF TIME

Respondent, State of Florida, pursuant to Florida Rule of Appellate Procedure 9.300, respectfully requests a thirty (30) day extension of time to file the State's answer brief on the merits. As grounds for this motion, the State would submit:

1. The answer brief is due March 7, 2016.
2. Despite diligent efforts, the undersigned attorney needs an additional period of time to research and prepare the answer brief in this cause due to a heavy caseload in state and federal courts.
3. There have been no prior requests for extensions of time by the attorney general's office in this case.
4. Undersigned counsel is authorized to state that counsel for Petitioner, Aaron Delgado, has no objection to this motion.
5. This motion is made in good faith and not for the purpose of unnecessary delay.

RECEIVED, 03/04/2016 11:18:34 AM, Clerk, Supreme Court

WHEREFORE, the State respectfully requests that this Court grant a thirty (30) day extension of time for the filing of its answer brief in this case.

Respectfully submitted,
PAMELA JO BONDI
ATTORNEY GENERAL

s/ Kristen L. Davenport
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COUNSEL FOR RESPONDENT

DESIGNATION OF EMAIL ADDRESS

Undersigned counsel can be served at the following email address: crimappdab@myfloridalegal.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above Motion has been furnished to Eric Latinsky and Aaron Delgado, counsel for Petitioner, 227 Seabreeze Boulevard, Daytona Beach, Florida 32118, by e-service to adelgado@communitylawfirm.com and elatinsky@communitylawfirm.com, this 4th day of March, 2016.

s/ Kristen L. Davenport
Kristen L. Davenport
Assistant Attorney General