

IN THE SUPREME COURT OF FLORIDA

LUIS TORRES JIMENEZ,

Petitioner,

v.

STATE OF FLORIDA, ET AL.,

Respondents.

Case No. SC16-1976

L.T. Case Nos: 3D15-2303
& 3D15-2271

**THE ATTORNEY GENERAL'S UNOPPOSED MOTION FOR
EXTENSION OF TIME IN WHICH TO SERVE ANSWER BRIEF**

Pursuant to Florida Rule of Appellate Procedure 9.300, the Attorney General moves for a 14-day extension of time in which to serve her Answer Brief.

1. Petitioner served his Initial Brief on June 30, 2017. Under a previously granted extension request, the Attorney General's Answer Brief is currently due to be served August 14, 2017. The Attorney General seeks a 14-day extension of time in which to serve her Answer Brief, up to and including August 28, 2017.

2. This is the Attorney General's second request for an extension of time in which to file an Answer Brief. The Florida Solicitor General's Office, which has recently undertaken representation in this proceeding, has numerous case assignments with pressing deadlines. Specifically, the attorneys involved in this case have a number of recent or upcoming deadlines, including but not limited to:

- a) **August 2, 2017** – Petition for Rehearing & Rehearing En Banc in *McDonough v. Fernandez-Rundle* (Eleventh Circuit Court of Appeals, No. 15-14642)
- b) **August 4, 2017** – Answer Brief in *City of Miami Beach v. Florida Retail Federation* (Third District Court of Appeal, No. 3D17-705)
- c) **August 7, 2017** – Response to Motion to Compel Discovery in *Hand v. Scott* (Northern District Court of Florida, No. 4:17-cv-128)
- d) **August 25, 2017** – Initial Brief in *Florida Department of Revenue v. Bugliaro* (Third District Court of Appeal, No. 3D17-1476)

3. The Solicitor General’s Office is also preparing for oral argument before this Court in *Goodman v. Florida Department of Law Enforcement*, No. SC16-1752, to be argued **August 30, 2017**.

4. In conjunction with this workload, the undersigned counsel has various family obligations and pre-planned travel commitments which require counsel to be out of the office August 4-11, and August 21-22. In light of this, counsel requires the full 14 days to prepare the Attorney General’s Answer Brief.

5. The undersigned has conferred with counsel for Petitioner and the other Respondent, the City of Aventura, and is authorized to represent that they have no objection to the requested relief. Further, counsel for Petitioner requests that, in granting the Attorney General’s extension request, the Court also extend

Petitioner's time for filing his reply brief to run from the date of the Attorney General's later-filed Answer Brief (as opposed to the City of Aventura's Answer Brief, which is currently due August 14).

WHEREFORE, the Attorney General requests a 14-day extension, up to and including August 28, 2017, in which to serve her Answer Brief.

Respectfully Submitted,

PAMELA JO BONDI
ATTORNEY GENERAL

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been furnished by electronic service through the Florida Courts E-Filing Portal on August 4, 2017 to the following counsel:

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