

IN THE SUPREME COURT OF FLORIDA
TALLAHASSEE, FLORIDA
CASE NO. SC16-56
Lower Tribunal No. 221983CF000012CFAXMX

CARY MICHAEL LAMBRIX,

Petitioner,

v.

JULIE L. JONES, SECRETARY,
FLORIDA DEPARTMENT OF
CORRECTIONS,

Respondent.

_____ /

**MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN EXCESS
OF PAGE LIMITS**

The American Civil Liberties Union Capital Punishment Project (ACLU-CPP) and the American Civil Liberties Union of Florida (ACLU-FL), as amici curiae, respectfully move for leave to file the accompanying brief in excess of the 20-page limitation set in forth in Florida Rule of Appellate Procedure 9.370. The proposed amicus brief is 23 pages in length.

Counsel for amici respectfully request a short 3-page extension in light of the significant and complicated issues addressed in the brief, which arise from the Supreme Court's recent decision in *Hurst v. Florida*, No. 14-7505, 2016 WL 112683 (U.S. Jan. 12, 2016).

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Counsel for Petitioner consents to the filing of the accompanying brief, but
counsel for respondent does not.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that a true and correct copy of the
foregoing has been furnished to Scott A. Browne, counsel for respondent, and to
counsel for Petitioner Lambrix, through the Florida Electronic Portal, this the 21st
day of January, 2016.

/s/ N. ADAM TEBRUGGE