

**IN THE SUPREME COURT OF FLORIDA
CASE NOS. SC16-8 & SC16-56**

CARY MICHAEL LAMBRIX,

Appellant,

v.

STATE OF FLORIDA,

Appellee.

CARY MICHAEL LAMBRIX,

Petitioner,

v.

JULIE L. JONES, etc.

Respondents.

MOTION FOR EXPANDED ORAL ARGUMENT

COMES NOW the Appellant/Petitioner, **CARY MICHAEL LAMBRIX**, by and through counsel, and herein files this motion for an expanded oral argument in the above-entitled matter which is currently set for February 2, 2016. As grounds therefore, Mr. Lambrix would state:

1. At issue in Mr. Lambrix's case are the implications of the January 12th decision in *Hurst v. Florida*, not just on Mr. Lambrix's death sentences, but also on

Florida's capital sentencing scheme as a whole. The impact of *Hurst* is reverberating throughout the State of Florida as evidenced by the lengthy special workshop that the Florida Senate conducted yesterday, January 27, 2016. Indeed during the workshop reference was made to the scheduled oral argument in Mr. Lambrix's case as particularly significant in helping to sort out what changes must be made to Florida's statutes in light of *Hurst*.

2. Under these circumstances, the time currently allotted to counsel is insufficient.

WHEREFORE, the Appellant/Petitioner respectfully requests this Court to expand the time accorded counsel to orally argue on his behalf.

Respectfully submitted,

NEAL A. DUPREE
Capital Collateral Regional
Counsel - South
Fla. Bar No. 311545

Respectfully submitted,

/s/ William M. Hennis, III
WILLIAM M. HENNIS, III
Florida Bar No. 0066850
Litigation Director CCRC-South
hennisw@ccsr.state.fl.us

MARTIN J. MCCLAIN
Florida Bar No. 0754773
Special Assistant CCRC-South
martymcclain@earthlink.net

M. CHANCE MEYER
Florida Bar No. 0056362
Staff Attorney CCRC-South
meyerm@ccsr.state.fl.us

JESSICA HOUSTON
Florida Bar No. 0098568
Staff Attorney CCRC-South
houstonj@ccsr.state.fl.us

Capital Collateral Regional Counsel-South
1 E. Broward Blvd., Suite 444
Fort Lauderdale, Florida 33301
(954) 713-1284

COUNSEL FOR MR. LAMBRIX

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been provided to: Scott A. Browne, Assistant Attorney General, Office of the Attorney General, 3507 East Frontage Road, Ste. 200, Tampa, FL 33607-7013, *Scott.Browne@myfloridalegal.com*; Capital Appeals Intake Box, *capapp@myfloridalegal.com*; via email service at *warrant@flcourts.org* this 28th day of January 2016.

/s/ William M. Hennis, III
WILLIAM M. HENNIS, III
Florida Bar No. 0066850
Litigation Director CCRC-South