

IN THE SUPREME COURT OF FLORIDA

GABRIEL BRIAN NOCK,

Petitioner,

v.

Case No. SC17-472

STATE OF FLORIDA,

Respondent.

\_\_\_\_\_/

MOTION FOR EXTENSION  
OF TIME TO FILE JURISDICTIONAL BRIEF

Respondent, the State of Florida, through undersigned counsel, hereby requests an extension of time in which to file its jurisdictional brief in the present case.

1. This is respondent's first request for an extension of time in this case. The jurisdictional brief is due for service on April 17, 2017.

2. Due to a large backlog of cases the undersigned has been unable to complete the State's jurisdictional brief in this cause. Thus some additional time will be needed for preparation of the brief in this case.

3. Undersigned counsel anticipates an extension of time of forty five (45) days will be sufficient time to adequately prepare the brief.

RECEIVED, 04/17/2017 09:53:26 AM, Clerk, Supreme Court

4. Undersigned counsel has contacted Petitioner's attorney, Paul Petillo, (Mr. Seldin was on leave) who states he has no objection to the granting of this motion.

5. This request is being made in good faith, not for purposes of delay and is absolutely necessary.

WHEREFORE, Respondent respectfully requests an extension of time of forty five (45) days from the date of this Court's Order in which to file the jurisdictional brief.

Respectfully submitted,

PAMELA JO BONDI  
Attorney General

/s/ Don M. Rogers

---

DON M. ROGERS  
Assistant Attorney General  
Florida Bar No. 0656445  
1515 N. Flagler Drive  
Suite 900  
West Palm Beach, FL. 33401  
(561) 837-5016  
[Crimappwpb@myfloridalegal.com](mailto:Crimappwpb@myfloridalegal.com)  
Counsel for Respondent

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing "Motion for Extension of Time" has been forwarded to Paul Petillo and Ian Seldin, Assistant Public Defenders, 421 Third St, 6<sup>th</sup> floor, West Palm Beach, FL. 33401 at [appeals@pd15.state.fl.us](mailto:appeals@pd15.state.fl.us) and filed with this court through the portal at [myflcourtaccess.com](http://myflcourtaccess.com) on April 17, 2017.

/s/ Don M. Rogers

---

Of Counsel