

**IN THE SUPREME COURT OF FLORIDA**

DIEGO TAMBRIZ-RAMIREZ,

Petitioner,

CASE No.: SC17-713

vs.

STATE OF FLORIDA,

L.T. Case No.: 4D15-2957

Respondent.

\_\_\_\_\_ /

**SECOND MOTION FOR EXTENSION OF TIME**

Petitioner, DIEGO TAMBRIZ-RAMIREZ, pursuant to Florida Rule of Appellate Procedure 9.300, hereby requests a seven (7) day extension of time to file the Petitioner's initial brief. As grounds for this motion, Petitioner submits the following:

1. On June 16, 2017, this Court accepted review of Petitioner's case.
2. When accepting this case for review, this Court issued an order identifying July 6, 2017 as the deadline for Petitioner to file his initial brief.
3. On July 5, 2017, undersigned counsel requested his first extension of time to file his initial brief.
4. This Court granted this extension with a due date of on or before August 7, 2017.
5. Since that time, undersigned counsel has made diligent efforts to review the record and prepare Petitioner's initial brief.

RECEIVED, 08/07/2017 09:13:26 AM, Clerk, Supreme Court

6. However, despite these diligent efforts, undersigned counsel needs an additional period of time to finalize the initial brief in this case.

7. Undersigned counsel was on military orders for the week of July 31 through August 4 and was unable to finalize this brief.

8. Undersigned counsel is requesting one additional week to finalize this brief with a due date on or before August 14, 2017.

9. Undersigned counsel is authorized to state that counsel for Respondent, Mark J. Hamel, of the Office of the Florida Attorney General, has no objection to this motion.

10. This motion is made in good faith and not for the purpose of unnecessary delay.

WHEREFORE, Petitioner, DIEGO TAMBRIZ-RAMIREZ, respectfully requests that this Court grant a seven (7) day extension of time for the filing of his initial brief in this case.

Respectfully submitted,

*s/ Rocco J. Carbone, III*

ROCCO J. CARBONE, III

LAW OFFICE OF ROCCO J. CARBONE, III, PLLC

320 HIGH TIDE DRIVE, SUITE 100

ST. AUGUSTINE, FL 32080

TELEPHONE: (904) 599-3238

FAX: (904) 460-0068

E-MAIL: [Rocco@rjc3law.com](mailto:Rocco@rjc3law.com)

FLORIDA BAR NO.: 0095544

ATTORNEY FOR PETITIONER

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished, via electronic mail on this 7<sup>th</sup> day of August 2017 to the following counsel:

PAMELA JO BONDI  
ATTORNEY GENERAL  
Tallahassee, Florida

MARK J. HAMEL  
Assistant Attorney General  
Florida Bar No. 0842621  
1515 North Flagler Drive Ninth Floor  
West Palm Beach, FL 33401  
(561) 837-5016  
[mark.hamel@myfloridalegal.com](mailto:mark.hamel@myfloridalegal.com)  
[CrimAppWPB@myfloridalegal.com](mailto:CrimAppWPB@myfloridalegal.com)

*Counsel for Respondent*