

IN THE SUPREME COURT OF FLORIDA

DEPARTMENT OF STATE, AN  
AGENCY OF THE STATE OF  
FLORIDA and KEN DETZNER, IN  
HIS OFFICIAL CAPACITY AS  
SECRETARY OF STATE FOR THE  
STATE OF FLORIDA,

CASE NO.: SC18-1287  
L.T. Case No.: 1D18-3260

Petitioners,

v.

FLORIDA GREYHOUND  
ASSOCIATION, INC., a Florida  
Corporation and JAMES BLANCHARD,  
Individually,

Respondents.

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**RESPONDENTS' RESPONSE TO PETITIONERS'  
MOTION FOR EXTENSION OF PAGE LIMIT FOR REPLY BRIEF**

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Respondents, Florida Greyhound Association, Inc. and James Blanchard, file this response to Petitioners' Motion for Extension of Page Limit for Reply Brief.

1. Since its outset, all parties have been aware of the expedited nature of this proceeding and the issues presented. See Joint Notice of Priority Status (R:95-98). On August 7, 2018, the Court entered an Order with an abbreviated briefing and oral argument schedule to accommodate the accelerated nature of the issues raised in the above-captioned appeal and the need for prompt resolution. Until today,

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no party filed a motion to adjust the deadlines set forth therein or the page restrictions set forth in Florida Rule of Appellate Procedure 9.210.

2. Pursuant to the Court's August 7, 2018 Order, the Petitioners' Initial Brief was due anytime on Wednesday, August 15th – fifteen days after the entry of the trial court's Final Judgment. Meanwhile, the deadline set for filing Respondents' Answer Brief was set for noon less than 6 days later. Thus, while the Petitioners had fifteen days to draft their initial brief, Respondents only had six days to draft their answer brief.

3. In addition, the Court granted leave for two amicus parties to file briefs in support of the Petitioners, each due on August 20, 2018 – the day prior to the deadline for filing Respondents' Answer Brief. Notably, the Respondents will not have an opportunity to file a written response to the arguments raised in the amicus briefs.

4. The Petitioners timely filed a 34-page Initial Brief. The two amici timely filed their respective briefs (approximately 19 pages by the Committee to Protect Dogs and 20 pages by the Animal Law Section). As a result, a total of roughly 75-pages have already been filed with the Court in support of the Petitioners' position.

5. The deadline for Petitioners to file their reply brief is Friday, August 24, 2018 at 5:00 PM – less than five days prior to the date set for oral argument in this proceeding.

6. For these reasons, the Respondents object to Petitioners’ request for additional pages as granting their request would be fundamentally unfair to the Respondents. At the outset, all parties understood to the expedited scheduling order with knowledge of the page limitations. Moreover, as the appealing party, the Petitioners have the advantage of filing a reply brief and should not be granted additional aids in presenting their written argument.

For these reasons, Respondents, Florida Greyhound Association, Inc. and James Blanchard, request that the Court deny the Petitioners’ Motion for Extension of Page Limit for Reply Brief.

DATED this 22nd day of August, 2018.

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I HEREBY CERTIFY that a copy of the foregoing has been furnished electronically to the following this 22nd day August, 2018:

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