

IN THE SUPREME COURT OF FLORIDA

CITIZENS OF THE STATE OF  
FLORIDA,

Appellant(s),

Case No.: SC18-213  
Lower Tribunal No. 20180007-EI

vs.

JULIE IMANUEL BROWN, ETC.,  
ET AL.

Appellee(s).

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**CITIZENS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE REPLY BRIEF**

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Pursuant to Rule 9.300, Florida Rules of Appellate Procedure, Appellant the Citizens of the State of Florida, by and through the Office of Public Counsel ("OPC"), hereby file this unopposed motion for an order extending the deadline for the filing of OPC's Reply Brief from August 14, 2018 to (and including) August 28, 2018. In support of this Motion, OPC states:

1. This case is an appeal by the OPC of Florida Public Service Commission ("PSC") Order No. PSC-2018-0014-FOF-EI. OPC's Initial Brief in this case was filed on May 1, 2018. Appellee PSC's Answer Brief was filed on July 23, 2018, and Appellee Florida Power & Light Company's ("FPL's") Amended Answer

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Brief was filed on July 25, 2018. Pursuant to Rule 9.210(f), the Appellant's Reply Brief is due on or about August 14, 2018.<sup>1</sup>

2. OPC is obligated to respond to two separate Answer Briefs filed in this matter by separate entities – Appellees FPL and the PSC. The burden of replying to 100 pages of briefing, as opposed to 50, necessitates OPC's request for supplemental time to analyze and reply to the voluminous arguments and case law cited in the two Answer Briefs.

3. OPC respectfully requests the Court to grant an extension of 14 days, until and including August 28, of the deadline to file the Reply Brief.

4. OPC certifies that on July 30, 2018, it contacted the attorneys for Appellees Florida Power & Light and Florida Public Service Commission, and is authorized to represent that Appellee FPL agrees to OPC's Motion and the PSC does not oppose OPC's Motion. In its May 7, 2018 Motion for Extension of Time to file Answer Brief, FPL represented that "...both FPL and the Commission agree to support any enlargement of time OPC might require to prepare its reply brief as a consequence of the 60-day extension requested [by FPL]."

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<sup>1</sup> OPC plans to file one Reply Brief which replies to both FPL's and PSC's Answer Briefs. The reply to the PSC's Answer Brief would ordinarily be due on August 13; however OPC is hereby requesting leave to calculate the time for the Reply brief from the date that FPL's Amended Answer Brief was filed, which was July 25, 2018.

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

WHEREFORE, the Citizens of the State of Florida respectfully request the Court to extend the deadline for filing OPC's Reply Brief to (and including) August 28, 2018, as specified in this motion.

J.R. KELLY, PUBLIC COUNSEL

*s/Stephanie A. Morse*

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Attorneys for Florida's Citizens

**CERTIFICATE OF SERVICE**

**SC18-213/20180007-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing  
**CITIZENS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
REPLY BRIEF** has been furnished by electronic mail on this 31st day of July, 2018,  
to the following:

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*s/Stephanie A. Morse*  
Stephanie A. Morse  
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## **CERTIFICATE OF COMPLIANCE**

**I HEREBY CERTIFY**, pursuant to Rule 9.100(1), Florida Rules of Appellate Procedure, that the CITIZENS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF was prepared using Times New Roman 14-point font.

*s/Stephanie A Morse* \_\_\_\_\_

Stephanie A. Morse  
Associate Public Counsel