

**SUPREME COURT OF FLORIDA**

**JOHNNY MACK SKETO CALHOUN,**  
**Appellant,**

**CASE NO.: SC18-340**

**vs.**

**STATE OF FLORIDA,**  
**Appellee.**

\_\_\_\_\_/

**DEFENDANT’S MOTION TO ENLARGE HIS INITIAL BRIEF**

Appellant, **JOHNNY MACK SKETO CALHOUN**, by and through undersigned counsel, respectfully requests this Court increase the page limitation of his initial brief in the instant proceedings and in support thereof states as follows:

1. Under the applicable Fla. R. App. P. 9.210(a)(5)(C), Mr. Calhoun is allowed 100 pages for an initial brief.
2. With this motion, Mr. Calhoun has contemporaneously filed an initial brief that is 112 pages long, including certificates.
3. Undersigned has made every effort to reduce the number of excess pages.
4. Mr. Calhoun requests the additional 12 pages because:
  - a. Mr. Calhoun raised a total of 18 issues in his Motion to Vacate Judgments of Conviction and Sentence and subsequent amendments, many of which involved numerous sub-claims.

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- b. All of Mr. Calhoun's guilt phase claims were denied, requiring briefing on numerous claims for this Court's consideration and preservation for federal review.
5. Fla. R. App. P. 9.210(a)(5)(E) provides that the court may permit longer briefs.
6. Undersigned contacted Assistant Attorney General Lisa Hopkins on July 18, 2018. Ms. Hopkins takes no position on the matter. Of course, Mr. Calhoun has no objection to a similar page extension for the State's answer brief, should it become necessary.

**WHEREFORE**, undersigned respectfully requests this Court allow a 12 page increase and accept Mr. Calhoun's 112 page brief as properly filed.

Respectfully submitted,

/s KATHLEEN PAFFORD  
Kathleen Pafford  
Assistant CCRC – North  
Florida Bar No. 99527

Elizabeth Salerno  
Assistant CCRC-North  
Florida Bar No.

COUNSEL FOR THE APPELLANT

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2018, the foregoing was electronically served via the e-portal to Assistant Attorney General Lisa Hopkins at [lisa.hopkins@myfloridalegal.com](mailto:lisa.hopkins@myfloridalegal.com).

/s/KATHLEEN PAFFORD

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