

SUPREME COURT OF FLORIDA

DEREK LANG SHINE, JR.,
Petitioner,

CASE NO. SC18-0688

vs.

L.T. NOS. 3D15-2876
3D15-2877
14-890
14-891

THE STATE OF FLORIDA,
Respondent.

UNOPPOSED
RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE
JURISDICTIONAL BRIEF

Respondent, THE STATE OF FLORIDA, pursuant to Fla. R. App. P. 9.300(a), without objection by Petitioner, respectfully moves for an extension of 20 days to file a jurisdictional brief.

On May 10, 2018, Petitioner filed a jurisdictional brief after timely filing a notice of discretionary review. Respondent's brief is due May 30. Fla. R. App. P. 9.120(d).

Due to his heavy case load, counsel for Respondent requests an additional 20 days to review Petitioner's brief and the decision below and draft a brief in response. Between May 24 and June 4, counsel will also be on leave from work. This request for additional time is made in good faith and not for unnecessary delay.

Counsel for Respondent consulted with counsel for Petitioner, Jeffrey DeSousa, who kindly informed that he does not object to this request for an

extension.

And so, Respondent respectfully requests that the Court extend the time for Respondent to file a jurisdictional brief by twenty days, or on or before **June 19, 2018.**

Respectfully submitted,

PAMELA JO BONDI
ATTORNEY GENERAL

/s/Jonathan Tanoos

JONATHAN TANOOS, FBN 88851
Assistant Attorney General

CERTIFICATE OF SERVICE

I CERTIFY that the foregoing document – *Respondent’s Unopposed Motion for Extension of Time to File Jurisdictional Brief* – has been delivered to Jeffrey DeSousa, Office of the Public Defender, at jdesousa@pdmiami.com and appellatedefender@pdmiami.com by **e-mail** on **May 23, 2018**.

/s/Jonathan Tanoos

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