

IN THE SUPREME COURT
OF FLORIDA

DEREK LANG SHINE JR.,
Petitioner,

Case No. SC18-688

v.

STATE OF FLORIDA,
Respondent.

**UNOPPOSED MOTION TO EXTEND
TIME FOR FILING REPLY BRIEF**

Petitioner Derek Lang Shine Jr., through counsel, hereby moves this Court for an extension of time for filing the reply brief in this matter. *See* Fla. R. App. P. 9.300(a). Petitioner respectfully requests an additional twenty days, and in support states as follows.

1. Petitioner's reply brief on the merits is due to be filed in this Court on October 15, 2018. This is Petitioner's first extension request.

2. Undersigned counsel has begun preparations for filing the brief, including by conducting legal research and starting a draft of the brief. But additional time is needed to ensure a quality submission.

3. Counsel is responsible for a heavy caseload in both the trial and appellate courts of this state. In the preceding month, counsel filed two opening merits briefs in the Third District Court of Appeal along with four reply briefs. Counsel presented three appellate oral arguments and appeared in the circuit court on numerous occasions.

4. Petitioner's counsel has consulted with counsel for Respondent, Assistant Attorney General Jonathan Tanoos, and is authorized to state that Respondent has no objection to the requested extension.

Wherefore, Petitioner respectfully requests that this Court extend the time for filing the reply brief on the merits by twenty days until November 4, 2018.

Respectfully submitted,

Carlos J. Martinez
Public Defender
Eleventh Judicial Circuit
1320 NW 14th Street
Miami, Florida 33125

/s/ Jeffrey Paul DeSousa
Jeffrey Paul DeSousa
Assistant Public Defender
Florida Bar No. 110951
appellatedefender@pdmiami.com
jdesousa@pdmiami.com
(305) 545-1960

October 12, 2018

CERTIFICATE OF SERVICE

Undersigned counsel certifies that a copy of the foregoing has been furnished
by electronic mail this **twelfth** day of October 2018 to the following:

Jonathan Tanoos
Assistant Attorney General
Criminal Appeals Bureau
Office of the Attorney General
One S.E. Third Avenue, Suite 900
Miami, FL 33131
crimappmia@myfloridalegal.com
jonathan.tanoos@myfloridalegal.com
Counsel for Respondent

/s/ Jeffrey Paul DeSousa
Jeffrey Paul DeSousa
Assistant Public Defender