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IN THE SUPREME COURT OF FLORIDA

JASON ANDREW SIMPSON,

Petitioner,

v.

Case No. SC19-700
L.T. No. 62002CF011026AXXXMA

MARK S. INCH,
SECRETARY, DEPARTMENT OF
CORRECTIONS,

Respondent.

_____/

PETITIONER'S UNOPPOSED MOTION FOR
FOUR-DAY EXTENSION OF TIME TO SERVE REPLY

Pursuant to Florida Rule of Appellate Procedure 9.300, Petitioner Jason Andrew Simpson respectfully requests that the Court extend the time to serve his reply to the State's response to his petition for writ of habeas corpus by four days, up to and including Friday, November 22, 2019, and states:

1. This is a habeas proceeding alleging ineffective assistance of appellate counsel in this capital case where Petitioner has received two capital sentences. The combined record on appeal is almost 20,000 pages in length. The issues raised in the habeas petition overlap with the issues presented in Simpson's concurrent appeal in Case No. SC18-1238 from the trial court's order denying his motion for postconviction relief following a 12-day evidentiary hearing. The trial court's order is over 170 pages long in 12 point font. Simpson's initial brief is 250 pages and challenges the denial of 24 substantive claims. The State's answer brief is 99 pages

and not only addresses the 24 claims raised by Simpson but raises a new claim (in a footnote) challenging that part of the trial court's order vacating Simpson's sentence.

2. While counsel have prepared a near-final draft of the reply, they cannot complete the reply until they have finalized the reply brief in the accompanying appeal of the trial court's order denying Appellant's Rule 3.851 motion in Case No. SC18-1238. By separate motion in that proceeding, they are seeking a final four-day extension of the time to file that brief to make it due November 18, 2019. No further extensions will be sought absent some unanticipated emergency.

3. Undersigned counsel has conferred with Jennifer Donahue, counsel for Respondent, and confirmed that the State has no objection to this request.

WHEREFORE**,** Petitioner respectfully requests that this Court extend the deadline for serving his reply by four days, up to and including November 22, 2019.

Respectfully submitted,

THE MILLS FIRM

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy hereof has been furnished by email to Jennifer A. Donahue, Assistant Attorney General, The Capitol PL-01, Tallahassee, Florida 32399, at Jennifer.donahue@myfloridalegal.com on November 15, 2019.

/s/John S. Mills_____
Attorney