

IN THE SUPREME COURT OF FLORIDA

TINA LASONYA BROWN,
Appellant,

CASE NO.: SC19-704

vs.

STATE OF FLORIDA,
Appellee.

DEFENDANT'S MOTION TO ENLARGE HER INITIAL BRIEF

Appellant, TINA LASONYA BROWN, by and through undersigned counsel, respectfully requests this Court increase the page limitation of her 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), Ms. Brown is allowed 100 pages for an initial brief.
2. With this motion, Ms. Brown has contemporaneously filed an initial brief that is 125 pages long, including certificates. Undersigned counsel has made every effort to reduce the number of excess pages.
3. Ms. Brown raised a total of 10 claims in her Motion to Vacate Judgments of Conviction and Sentence and subsequent amendments, many of which involved numerous sub-claims.
4. All of Ms. Brown's claims were denied, requiring briefing on numerous claims for this Court's consideration and preservation for federal review. These claims include both guilt phase and penalty phase

ineffective assistance of counsel claims, a newly discovered evidence claim, a biased juror claim, a cumulative error claim, and a *Hurst* claim.

5. The circuit court's order, without attachments, denying all of Ms. Brown's claims was itself over 100 pages long.
6. Fla. R. App. P. 9.210(a)(5)(E) provides that the court may permit longer briefs. Ms. Brown would have 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 25 page increase and accept Ms. Brown's 125 page brief as properly filed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic service to counsel of record, on August 21, 2019.

Respectfully submitted,

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