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IN THE SUPREME COURT OF FLORIDA

MICHAEL LAWRENCE WOODBURY,
Appellant, CASE NO.: SC19-0008

vs.

STATE OF FLORIDA,
Appellee.
_____/

MOTION FOR EXTENSION OF TIME FOR FILING INITIAL BREIF

Appellant, Michael Lawrence Woodbury, moves this Court for an order extending the time for filing the Initial Brief in this case, and as grounds, states:

1. The present case is a capital direct appeal. Capital cases are given a higher degree of scrutiny due to the considerations of finality of the sentence.

2. Appellant's Initial Brief is currently due for filing tomorrow Tuesday, August 27, 2019.

3. This Court granted Appellant's motion for a 5-day extension on Thursday, August 22, 2019; this was Appellant's first extension. Undersigned counsel believed that a short extension was sufficient to edit the Initial Brief. However, as this is undersigned counsel's first capital brief, it was unanticipated that a lengthier extension would be needed. At present, the brief is in excess of 150 pages and an extension is needed to trim the page length. An extension of time is essential to the

competent representation of Appellant in this case. See Rule 4-1.1, Rules Regulating Florida Bar (2019).

4. Undersigned counsel respectfully requests 25 days, in which to file the Initial Brief.

5. This motion is made in good faith and not for the purpose of delay. Undersigned counsel has worked diligently on this case, but cannot meet the Court's deadline.

6. Assistant Attorney General, Rhonda Giger, has been contacted, and she has indicated that the State does not object to this motion.

WHEREFORE, Appellant requests an extension of 25 days, to and including Friday, September 20, 2019, within which to file the Initial Brief in this cause.

Respectfully submitted,

CAREY HAUGHWOUT
Public Defender, 15th Judicial Circuit

/s/ Mara Herbert
Mara Herbert
Assistant Public Defender
15th Judicial Circuit of Florida
421 Third Street/6th Floor
West Palm Beach, Florida 33401
(561) 355-7600
Florida Bar No. 0038532
mherbert@pd15.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this motion has been furnished to Rhonda Giger, Assistant Attorney General, 1515 N. Flagler Dr., Suite 900, West Palm Beach, FL 33401 by e-service at CrimAppWPB@MyFloridaLegal.com; and electronically filed with this court on the 26th day of August, 2019.

/s/ Mara Herbert
Of Counsel