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IN THE SUPREME COURT OF FLORIDA

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

vs.

STATE OF FLORIDA,
Appellee.
_____/

RECEIVED, 01/09/2020 03:00:33 PM, Clerk, Supreme Court

MOTION FOR EXTENSION OF TIME FOR FILING REPLY BRIEF

Appellant, Michael Lawrence Woodbury, moves this Court for an order extending the time for filing the Reply 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 Reply Brief is currently due for filing Monday, January 13, 2020. No extensions of time have previously been sought.

3. Appellee's Answer Brief is 100 pages in length. Appellant needs to respond to 11 points on appeal.

4. Due to the holidays and illness, undersigned counsel was unable to work on the case for several days. Every effort was made to complete the brief on time but undersigned counsel was unable to do so given the numerous legal issues. Undersigned counsel needs additional time to edit and revise.

5. Undersigned counsel respectfully requests an additional 15 days, in which to file the Reply Brief.

6. 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 due to time out of the office and the complexity of the issues present in this case. 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).

7. 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 15 days, from Monday January 13, 2020, within which to file the Reply Brief in this cause.

Respectfully submitted,

CAREY HAUGHWOUT
Public Defender, 15th Judicial Circuit

/s/ Mara Herbert
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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 9th day of January, 2020.

/s/ Mara Herbert
Of Counsel