

IN THE SUPREME COURT OF FLORIDA

MARK D. SIEVERS,

Appellant,

v.

**CASE NO. SC20-0225
DEATH PENALTY CASE**

STATE OF FLORIDA,

Appellee.

_____ /

UNOPPOSED MOTION TO ACCEPT ENLARGED ANSWER BRIEF

COMES NOW, the State of Florida, by and through the undersigned Assistant Attorney General, and hereby files this unopposed motion to accept an enlarged Answer Brief for the above-captioned case, and as grounds therefor, states the following:

1. This is an appeal from a judgment of conviction imposing a sentence of death.
2. The Initial Brief contains 31,280 words and has eighteen issues.
3. In order to adequately respond to the copious issues and argument presented in the Initial Brief, it is necessary for the Answer Brief to exceed the 25,000-word limitation.

RECEIVED, 05/28/2021 01:54:27 PM, Clerk, Supreme Court

4. The Answer Brief for the instant case is 30,641 words and 150 pages.

5. Undersigned counsel has contacted opposing counsel, Karen M. Kinney, Assistant Public Defender, and she does not object to this motion.

WHEREFORE, Appellee, State of Florida, respectfully requests this Court to accept the enlarged Answer Brief.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of May, 2021, I electronically filed the foregoing with the Clerk of Court by using the Florida Courts E-Portal Filing System which will send a notice of electronic filing to the following: Karen Kinney, Assistant Public Defender, 10th Judicial Circuit Public Defender's Office, P.O. Box 9000 - Drawer PD, Bartow, Florida 33830, **appealfilings@pd10.org**, **kkinney@pd10.org**, **kstockman@pd10.org**.

ASHLEY MOODY
ATTORNEY GENERAL
STATE OF FLORIDA

/s/ Christina Z. Pacheco
CHRISTINA Z. PACHECO
Assistant Attorney General

Florida Bar No. 71300
Christina.Pacheco@myfloridalegal.com
Office of the Attorney General
3507 East Frontage Road, Suite 200
Tampa, Florida 33607-7910
Telephone: (813) 287-7910
Facsimile: (813) 281-5501
E-Service: capapp@myfloridalegal.com