

IN THE SUPREME COURT OF THE STATE OF FLORIDA

ZAVION ALAHAD,

Petitioner,

v.

Case No. SC21-1450

STATE OF FLORIDA,

Respondent.

_____/

MOTION FOR EXTENSION OF TIME

COMES NOW Respondent, STATE OF FLORIDA, by and through undersigned counsel, and hereby respectfully requests an extension of time in which to file its answer brief:

1. This is Respondent's first motion for extension of time. The answer brief is presently due for service.
2. Due to a combination of the internal review process in undersigned's office and preparation for oral argument before the Fourth District Court of Appeal in the coming weeks, undersigned respectfully requests an extension of thirty (30) days to complete the answer brief.
3. Undersigned has contacted opposing counsel, Christine Geraghty, Esq, who has advised that she has no objection to the relief

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requested in this motion.

4. This request is being made in good faith, not for purposes of delay, and is absolutely necessary.

WHEREFORE, Respondent respectfully requests an extension of time of thirty (30) days from the current due date of April 18, 2022, in which to file the answer brief.

Respectfully submitted,

ASHLEY MOODY
ATTORNEY GENERAL
Tallahassee, Florida

/s/Deborah Koenig
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing was furnished via the E-Filing Portal to Christine Geraghty, Esq., Counsel for Petitioner, 421 Third Street, 6th Floor, West Palm

Beach, FL 33401 at cgeraghty@pd15.state.fl.us and
appeals@pd15.org on April 18, 2022.

/s/Deborah Koenig
DEBORAH KOENIG
Counsel for Respondent