

IN THE SUPREME COURT OF FLORIDA

ZAVION ALAHAD,

Petitioner,

v.

STATE OF FLORIDA,

Respondent.

Case No. SC21-1450

MOTION FOR EXTENSION OF TIME

Pursuant to Florida Rule of Appellate Procedure 9.300, the State of Florida moves for a two-week extension of time to file and serve its answer brief. As grounds for this request, the State provides:

1. The State's answer brief is currently due on July 18, 2022.
2. Previously, the State moved for, and received, a 30-day extension of time in April 2022.
3. Thereafter, the Office of the Solicitor General assumed responsibility for litigating the case on behalf of the State and entered an appearance on April 29, 2022.
4. Because the undersigned faced multiple pressing deadlines in emergency matters with limited staff assistance, the

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State requested two additional 30-day extensions to serve its answer brief, both of which this Court granted.

5. Undersigned counsel, however, has continued to face unexpected deadlines in emergency matters with limited staff assistance, hindering counsel's ability to thoroughly and adequately brief the important issues presented in this case. During the most recent 30-day extension period, for instance, the undersigned was the lead drafter on several briefs in a high-profile emergency challenge to a recently effective state law; supervised the filing of an answer brief in the Eleventh Circuit; drafted a dispositive trial-court motion in opioid-related litigation; and researched and developed the State's post-decision litigation strategy in an Eleventh Circuit appeal.

6. The State therefore respectfully requests an additional two-week extension to file and serve its answer brief, up and through August 1, 2022.

7. This request is not intended to cause undue delay, nor will any party suffer prejudice as a result of this extension.

8. In accordance with Rule 9.300(a), the State certifies that it has conferred with counsel for Petitioner, who takes no position on this request.

WHEREFORE, the State requests that this Court grant this motion for extension of time and permit the State's answer brief to be due by August 1, 2022.

Respectfully submitted,

ASHLEY MOODY
Attorney General

/s/ David M. Costello
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Solicitor General

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was furnished via the e-Filing Portal to counsel for all parties of record on this 13th day of July, 2022.

/s/ David M. Costello
Assistant Solicitor General