

IN THE SUPREME COURT OF FLORIDA

CITY OF TALLAHASSEE, FLORIDA,
et al.,

Petitioners,

Case No. SC21-651

v.

L.T. Case Nos. 1D20-2193
2020-CA-1011

FLORIDA POLICE BENEVOLENT
ASSOCIATION, INC., *et al.*,

Respondents.

_____ /

UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to Florida Rule of Appellate Procedure 9.300(a),
Petitioner, the City of Tallahassee, Florida (“the City”), joined by
Intervenors/Petitioners, the First Amendment Foundation; Florida
Press Association; Gannett Co., Inc.; The McClatchy Company, LLC
d/b/a *Miami Herald* (f/k/a Miami Herald Media Company); and The
New York Times Company (collectively, “the News Media Coalition”),
move this Honorable Court for a 30-day extension of time to file and
serve their initial briefs on the merits.¹ As grounds for this request,
Petitioners state:

¹ As they have throughout the proceedings in the lower courts, the
City and the News Media Coalition intend to present their own
arguments to this Court and will be filing separate briefs. This

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1. This Court accepted jurisdiction over this case in an order dated December 21, 2021. Based on that order, the initial merits briefs are currently due to be served on or before January 25, 2022.

2. Petitioners request a 30-day extension, through and including February 24, 2022, to prepare and submit the initial briefs. This is Petitioners' first request for extension of time in connection with the initial briefs.

3. This request for extension of time is necessary in part because of the holidays and in part because of the competing professional obligations of undersigned counsel. Those competing obligations preclude counsel from being able to provide this Court with their best work product by the current due date. This extension request will allow counsel enough time to adequately and thoroughly prepare the initial briefs.

4. This request is not intended for purposes of delay. No prejudice will be suffered by any party as a result of this extension.

5. In accordance with rule 9.300(a), the undersigned certify that they have contacted Luke Newman, counsel for Respondents.

motion is presented jointly simply for expediency and to conserve judicial resources.

Mr. Newman advised that Respondents do not object to this extension.

WHEREFORE Petitioners respectfully move for a 30-day extension of time, until February 24, 2022, to file and serve their initial briefs on the merits.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Florida Courts E-Filing Portal on all counsel in the below service list on this 7th day of January 2022.

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