

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”), moves this
Honorable Court for a 2-week extension of time to file and serve its
initial brief on the merits. As grounds for this request, Petitioner
states:

1. This Court accepted jurisdiction over this case in an
order dated December 21, 2021. The City previously requested,
and this Court granted, a 30-day extension, through and including
February 24, 2022, to prepare and submit the initial brief.

2. The City is now requesting a 2-week extension to prepare
and submit the initial brief. This is the City’s second request for

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extension of time in connection with the initial brief, and will be its last request.

3. This request for extension of time is necessary because of an unexpected family medical emergency for the undersigned.¹ Due to the family emergency, the undersigned is precluded 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 brief. Given the importance of this case and the need for the best possible briefing as this Court considers the important constitutional question at issue, the undersigned requests this short additional extension.

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, and Mark Caramanica, counsel for the News Media. Mr. Newman & Mr. Caramanica advised that they do not object to this extension.

¹ The undersigned can provide more details regarding the family emergency should the Court request same.

WHEREFORE Petitioner, the City of Tallahassee, respectfully moves for a 2-week extension of time, until March 10, 2022, to file and serve its initial brief 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 15th day of February 2022.

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