

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., JOHN DOE 1,
and JOHN DOE 2,

Respondents.

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**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO SERVE INITIAL MERITS BRIEF**

Pursuant to Florida Rule of Appellate Procedure 9.300(a),
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 (“the News Media Coalition”), move this Honorable Court to grant
it a two-week extension of time, up to and including through March 10, 2022,
to serve its initial merits brief. As grounds for this request, the News Media
Coalition states:

1. The News Media Coalition, together with Petitioner, the City of
Tallahassee (“City”), are seeking review of a decision of the First District
Court of Appeal regarding the interpretation of “Marsy’s Law,” a 2018 Florida

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Constitutional Amendment. See Art. I, § 16, Fla. Const. The interpretive question at issue is whether Marsy's Law crime "victim" status can be invoked to shield a law enforcement officer's name from public disclosure in regards to on-duty actions, in this case law enforcement shootings resulting in civilian deaths.

2. This Court accepted jurisdiction on December 21, 2021.

3. The initial merits briefs were originally due on January 25, 2022.

The Petitioners requested an extension to February 24, 2022, which the Court granted on January 7, 2022.

4. The News Media Coalition now seeks one final extension of two weeks, up to and including through March 10, 2022, to file its opening brief. Due to the pressing nature of other matters, which include, for example, competing discovery deadlines and evidentiary hearings, the extension is necessary to ensure that the News Media Coalition has an opportunity to fully and thoroughly brief the issues presented in this case.

5. In addition, the City has similarly sought the same two-week extension, which was not opposed. Thus, an extension for the News Media Coalition will ensure that the briefing schedules for answering and *amicus* parties remains uniform.

6. This request is not intended for purposes of delay. No party will be prejudiced as a result of this extension of time.

7. As required by rule 9.300(a), the undersigned counsel certifies that they have contacted counsel for Respondents, Luke Newman, and he advised that Respondents do not object to this requested extension.

WHEREFORE, Interveners/Petitioners, the News Media Coalition, respectfully move for an extension of time through March 10, 2022, to serve its initial merits brief.

Respectfully submitted,

THOMAS & LOCICERO PL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **15th** day of **February, 2022**, I caused a true and correct copy of the foregoing to be served electronically upon counsel of record by e-mail via the Florida Courts E-Filing Portal to:

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