

**IN THE SUPREME COURT OF FLORIDA**

CITY OF TALLAHASSEE, FLORIDA  
et. al.,

Petitioners,

vs.

Case No.: SC21-651  
DCA Case No.: 1D20-2193

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**  
**MERITS ANSWER BRIEF**

Respondents move this Court to grant a 30-day extension of time, up to and including May 11, 2022, to serve their answer brief on the merits. In support thereof, Respondents offer the following:

1. This Court accepted jurisdiction on December 21, 2021.
2. Initial merits briefs were originally due on January 25, 2022.

Petitioners sought and received extensions of time. Initial merits briefs were served on March 10, 2022. Five amicus curiae briefs were subsequently filed. The final amicus curiae brief was filed on March 21, 2022.

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3. Respondents seek a 30-day extension of time to file the answer brief on the merits. Undersigned counsel for the respondents has been working under competing deadlines in District Court matters and has not had sufficient time to prepare or serve a suitable answer brief. This request is sought to ensure a full and thorough opportunity to brief the issues presented by the Petitioners and amicus curiae.

4. This motion is submitted in utmost good faith and not for the purposes of undue delay. Undersigned counsel certifies that he has contacted counsel for the Petitioners and that counsel for the Petitioners do not object to this request.

WHEREFORE, Respondents respectfully move for an extension of time through May 11, 2022 to serve their merits answer brief.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been filed using the Florida ePortal system and **electronic** service has been directed to all attorneys of record as well as all alternate email addresses displayed in the Florida ePortal on this eleventh (11th) day of April, 2022.

Respectfully submitted;

/s/ Luke Newman

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