

IN THE SUPREME COURT OF FLORIDA

STATE OF FLORIDA,

CASE NO.: SC22-0458

Petitioner,

vs.

ZACHARY JOSEPH PENNA,

Respondent.

\_\_\_\_\_/

**UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE ANSWER BRIEF**

Respondent, through counsel, requests this Court to extend the time to file the answer brief for 30 days, making it due March 29, 2023. As grounds, respondent states:

1. The answer brief is due February 27, 2023, but undersigned counsel has been unable to complete it. Undersigned counsel's health, doctor appointments, and duties to other clients have delayed preparation of the brief. An additional 30 days, however, should be sufficient.

2. Deputy Solicitor General Evan Ezray graciously stated that he has no objection to this motion.

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3. This request is made in good faith and not for purposes of delay.

WHEREFORE, respondent respectfully requests this Court to extend the time to file the answer brief for 30 days, making it due March 29, 2023.

Respectfully submitted,

CAREY HAUGHWOUT  
Public Defender, 15<sup>th</sup> Judicial Circuit

/s/ Paul E. Petillo  
Paul E. Petillo  
Assistant Public Defender  
15th Judicial Circuit of Florida  
Criminal Justice Building  
421 Third Street/6th Floor  
West Palm Beach, Florida 33401  
(561) 355-7600  
Florida Bar No.: 50843

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that this motion has been furnished to Evan Ezray, Deputy Solicitor General, The Capitol, PL-01, Tallahassee, FL 32399 by e-service at [evan.ezray@MyFloridaLegal.com](mailto:evan.ezray@MyFloridaLegal.com); and electronically filed with this court on 23rd of February, 2023.

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/s/ Paul E. Petillo  
Of Counsel