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July 23, 2018

Honorable Scott S. Harris, Clerk Supreme Court of the United States One First Street N.E. Washington, D.C. 20543

Re: Michael Reynolds v. State of Florida Case No. 18-5181: CAPITAL CASE

Dear Mr. Harris:

We are requesting a 30-day extension of time, up to and including September 7, 2018, for the filing of a Brief in Opposition to the petition for certiorari filed in the capital case of Michael Reynolds, Case No. 18-5181, currently due on August 8, 2018. Due to staffing changes, this case was recently reassigned to Assistant Attorney General Marilyn Beccue for purposes of drafting the Brief in Opposition. The Florida Supreme Court's decision in this case specifically addressed the interplay between the Florida Supreme Court's decision in Hurst v. State, 202 So. 3d 40 (2016); the Eighth Amendment to the United States Constitution, and this Court's decision in Caldwell v. Mississippi, 472 U.S. 320 (1985). Although the issues raised in the Petition are not unique, there is insufficient time to adequately review the record and the relevant caselaw to fully respond to the petition. We have contacted counsel for the Petitioner, Julissa R. Fontán, who has represented that Petitioner has no objection to the granting of this extension.

Thank you for consideration of this request.

Sincerely,

SCOTT A. BROWNE\*

Senior Assistant Attorney General

Florida Bar No. 0802743

\*Counsel of Record

MARILYN M. BECCUE

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cc: Julissa Fontán, Capital Collateral Regional Counsel