

IN THE SUPREME COURT OF THE UNITED STATES

A.R., PETITIONER

vs.

FLORIDA DEPARTMENT OF CHILDREN AND FAMILIES

**THE DEPARTMENT'S OPPOSITION TO THE PETITIONER'S
MOTION FOR THIRTY DAY EXTENSION TO PAY FILING FEE AND
TO FILE A PETITION COMPLIANT WITH S. CT. R. 33.1**

The Respondent, the Florida Department of Children and Families (“the Department”), by and through undersigned counsel, files this opposition to the Petitioner’s motion for a thirty-day extension to pay the filing fee and file a petition that complies with S. Ct. R. 33.1, and states as following:

1. Petitioner’s motion for a thirty-day extension is based on his medical issues, his counsel’s interstate travel, counsel’s work deadlines, and his wait for quotes to reformat the petition into booklet format.
2. Petitioner’s motion fails to articulate a valid basis for the delay as he has failed to show that a vendor requires thirty days to provide the petition in a booklet format.
3. The former mother R.L. surrendered her parental rights which resulted in the entry of a final judgment that terminated her

parental rights by the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County on April 30, 2019.

4. The Minor P.R. ("Minor") was sheltered by the Department on February 8, 2017, then sheltered by the court on February 9, 2017 and has remained in the dependency system since then.
5. The Minor is in a pre-adoptive placement and wishes to be adopted; thus, a thirty-day extension will further delay her desire to achieve permanency.

WHEREFORE, the Department respectfully requests that this Honorable Court deny the Petitioner's motion for a thirty-day extension of time.

Respectfully submitted:

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