

*Attorneys for Appellee/Applicant
Jarrod Miller*

Pursuant to Supreme Court of Georgia Rule 12 and 4(j), Appellant Deborah Gonzalez and Appellee Jarrod Miller jointly move this Court for an extension of time for Appellant to file Appellant's Principal Brief and Enumeration of Errors through and until July 11, 2023, a 20 day extension, and for Appellee to file Appellee's Response Brief through and until August 10, 2023, a 10 day extension. In support of this motion, the Parties show the Court the following:

This appeal involves a May 9, 2023 order that denied Appellant's motion to dismiss Appellee's petition for a writ of mandamus and the Appellant's subsequent confession to judgment pursuant to O.C.G.A. § 9-12-18(a). Appellant filed a notice of appeal on May 12, 2023, and an amended notice of appeal on May 17, 2023. The appeal was docketed on June 1, 2023.

Appellant seeks a 20 day extension of time to file her Principal Brief and Enumeration of Errors through and including July 11, 2023. Appellant's Brief is presently due to be filed on or before June 21, 2023. Appellant requests this extension due to multiple circumstances, including lead counsel's previously scheduled travel and leave spanning most of the current briefing window, counsel's current caseload, and the complexity of this case.

Appellee does not oppose Appellant's extension request. But an extension of Appellant's time to file her opening brief results in Appellee's deadline to file his Response Brief falling during Appellee's lead counsel's previously scheduled travel

and leave. Accordingly, Appellee also seeks a corresponding 10 day extension to file his response brief. Appellee's Response Brief would be due on or before August 10, 2023. Appellant does not oppose Appellee's extension request.

Respectfully submitted, this 9th day of June, 2023.

/s/ Jeffrey R. Baxter

S. DEREK BAUER
Georgia Bar No. 042537
JEFFEREY R. BAXTER
Georgia Bar No. 142356
TYLER D. FABBRI
Georgia Bar No. 217608
BAKER & HOSTETLER LLP
1170 Peachtree Street, NE
Suite 2400
Atlanta, Georgia 30309
(404) 459-0050 (phone)

Counsel for Appellant
District Attorney Deborah Gonzalez

/s/ Kevin E. Epps

KEVIN E. EPPS
Georgia Bar No. 785511
TYLER M. GAINES
Georgia Bar No. 855701
**EPPS, HOLLOWAY, DELOACH &
HOIPKEMIER, LLC**
1220 Langford Drive
Building 200-101
Watkinsville, Georgia 30677
(706) 508-4000 (phone)

LANE FITZPATRICK
Georgia Bar No. 262274
P.O. Box 660
Danielsville, Georgia 30633
(706) 296-1968 (phone)

Attorneys for Appellee
Jarrold Miller

CERTIFICATE OF SERVICE

I certify that I have this day served a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO FILE BRIEFS OF APPELLANT AND APPELLEE** on all counsel of record by electronic mail and by placing a copy of same in the United States Mail with sufficient postage affixed thereon, addressed as follows:

Kevin E. Epps
Tyler M. Gaines
Epps, Holloway, Deloach &
Hoipkemier, LLC
1220 Langford Drive
Building 200-101
Watkinsville, Georgia 30677

Lane Fitzpatrick
Attorney at Law
Post Office Box 660
Danielsville, Georgia 30633

This 9th day of June, 2023.

/s/ Jeffrey R. Baxter

Jeffrey R. Baxter
Georgia Bar No. 142356