

IN THE DISTRICT COURT OF APPEAL
FIRST DISTRICT

Donna S. Adelson

Appellant,

Case 1D2025-2848

L.T. No.: 2023CF3226A

v.

State of Florida,

Appellee.

_____/

**MOTION FOR EXTENSION OF TIME FOR FILING THE
INITIAL BRIEF OF APPELLANT DUE TO MEDICAL EMERGENCY**

Appellant, Donna S. Adelson, through undersigned counsel, hereby moves this Court to extend the time for filing her initial brief due to a medical emergency. As grounds, Appellant states as follows:

1. On Tuesday, August 4, 2026, Appellant called the undersigned's co-counsel, Jackie Fulford, to advise her that she had been seen in medical because she was in excruciating pain due to an abscess on her arm that was the size of a tennis ball.
2. Appellant told Attorney Fulford that she was very upset because, despite being in excruciating pain, medical only prescribed her an antibiotic and told her they suspected that it was MRSA. Medical staff also told her to go back to her dormitory and put a hot compress on her arm

so that it would burst and that once it did, to come back to medical so that they could get a sample to confirm whether or not it was MRSA.

3. Medical staff did not give Appellant anything to use as a compress.

4. To assist Appellant, her cellmate filled a bottle of hot water to hold it against her arm like a compress.

5. On Thursday, August 6, 2026, Appellant continue to suffer from extreme pain.

6. Today, August 7, 2026, Appellant requested to be seen in medical as an emergency. She was then admitted to emergency medical for treatment and received an IV.

7. It should be noted that Appellant is a 78-year-old woman who has an array of underlying medical conditions.

8. Other than the initial call, Appellant has not contacted Attorney Fulford. Additionally, Appellant has missed all attorney calls that had been scheduled for the week.

9. Prior to this medical emergency, counsel was planning to go over the initial brief with her prior to filing it on August 14, 2026. Due to being admitted to medical, it will not be possible to discuss the contents of the initial brief with her.

10. Because counsel does not know how long she will stay in medical or the seriousness of her condition if it turns out to be a case of MRSA, it is unclear when she will be able to discuss the brief.

11. As such, the undersigned is requesting a continuance of 14 days from the date the initial brief is currently due on August 14, 2026.

12. Because this motion contains Protected Health Information of the Appellant, undersigned counsel requests that it not be published on the Court's docket.

13. Counsel for the Appellee, State of Florida, has not been contacted due to the business hours of Office of the Attorney General ending at 5:00 p.m.

14. This motion is being made in good faith and not for the purpose of delay.

Respectfully submitted,

M. Lilja Dandelake

M. Lilja Dandelake

FBN: 0162582

Law Office of Jackie Fulford

4948 Six Oaks Dr.

Tallahassee, FL 32303

Telephone: (850) 445-0790

Email: dandelakelaw@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Florida Courts E-Filing portal on August 7, 2026, to the Appellee.

M. Lilja Dandelake

M. Lilja Dandelake
Counsel for Appellant Donna Adelson