

THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

RABBI MERRILL SHAPIRO, REVEREND
KENT SILADI, REVEREND HARRY
PARROTT, JR., REVEREND HAROLD
BROCKUS, RABBI JACK ROMBERG,
REVEREND BOBBY MUSENGWA,
ANDY FORD, LEE SWIFT and SUSAN
SUMMERS-PERSIS,

Case No. 2011-CA-1892
(Honorable Jackie L. Fulford)

Plaintiffs,

v.

KURT BROWNING, in his official capacity
as Florida Secretary of State,

Defendant,

and

STATE OF FLORIDA,

Intervenor/Defendant.

FILED
LEON COUNTY, FLORIDA

2011-09-14 09:52

FILED

**FLORIDA CATHOLIC CONFERENCE'S AGREED MOTION
FOR LEAVE TO FILE AN AMICUS BRIEF**

The Florida Catholic Conference ("FCC"), by and through undersigned counsel and with the agreement and consent of Plaintiffs, Defendant Kurt Browning in his official capacity as Florida Secretary of State ("Secretary of State"), and Intervenor/Defendant the State of Florida, respectfully moves for leave to file an amicus brief in support of the ballot amendment and, in support of that agreed motion, states:

1. The FCC is a nonpartisan group serving as liaison to state government on matters of concern to the Catholic Church in the seven dioceses of Florida. Established in 1969 as an agency of the Catholic bishops of Florida, the FCC speaks for the Catholic Church and

IN
COMPUTER
R.R.

represents a number of organizations serving the Florida community through Catholic health care, education, and social welfare programs. On issues of importance to the Catholic Church in Florida, the FCC advocates sound public policies in federal, state, and administrative forums in accordance with faith-based principles.

2. The ballot amendment at issue in this case is of interest and concern to the Catholic Church in Florida. Accordingly, the FCC respectfully requests leave to file an amicus brief in support of the ballot amendment.

3. Given the parties' agreed briefing schedule, the FCC proposes to serve its amicus brief on October 7, which is one week after the initial briefing on September 30, and one week before the responses are due on October 14. The FCC will provide courtesy copies of the amicus brief to the Court and all parties at the time the amicus brief is filed.

4. Unless this Court desires to hear from the FCC at the October 27 hearing, the FCC does not request any argument time.

5. The undersigned has conferred with Ronald G. Meyer, counsel for the Plaintiffs, Daniel E. Nordby, counsel for the Secretary of State, and Scott D. Makar, counsel for the State of Florida, who have all agreed to the relief sought by this Motion.

WHEREFORE, the Florida Catholic Conference respectfully requests that this Court enter an Order granting it leave to serve an amicus brief in support of the ballot amendment by October 7.

Respectfully submitted,

WHITE & CASE LLP

Southeast Financial Center
200 South Biscayne Boulevard, Suite 4900
Miami, Florida 33131-2352
Telephone: (305) 371-2700
Facsimile: (305) 358-5744

By: 

Raoul G. Cantero
Fla. Bar No. 552356
rcantero@whitecase.com
Laura M. Reich
Fla. Bar No. 22792
lreich@whitecase.com

Counsel for the Florida Catholic Conference

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email and U.S. Mail this 8th day of September, 2011, upon the following:

RONALD G. MEYER
Florida Bar No. 0148248
Email: rmeyer@meyerbrookslaw.com
JENNIFER L. BLOHM
Florida Bar No. 0106290
Email: jblohm@meyerbrookslaw.com
LYNN C. HEARN
Florida Bar No. 123633
Email: lhearn@meyerbrookslaw.com
MEYER, BROOKS, DEMMA AND
BLOHM, P.A.
P.O. Box 1547 (32302)
131 North Gadsden Street
Tallahassee, FL 32301
(850) 878-5212
(850) 656-6750 (Facsimile)

Attorneys for Plaintiffs

SCOTT D. MAKAR
Florida Bar No. 709697
Email: scott.makar@myfloridalegal.com
LOUIS F. HUBENER, III
Florida Bar No. 140084
Email: lou.hubener@myfloridalegal.com
TIMOTHY D. OSTERHAUS
Florida Bar No. 133728
Email: timothy.osterhaus@myfloridalegal.com
OFFICE OF THE ATTORNEY GENERAL
The Capitol, PL-01
Tallahassee, Florida 32399-1050
(850) 414-3300
(850) 410-2672 (Facsimile)

*Attorney for Intervenor/Defendant State of
Florida*

DANIEL E. NORDBY
General Counsel
Florida Bar No. 014588
Email: Daniel.Nordby@dos.myflorida.com
ASHLEY E. DAVIS
Assistant General Counsel
Florida Bar No. 48032
Email: Ashley.Davis@dos.myflorida.com
FLORIDA DEPARTMENT OF STATE
R.A. Gray Building
Tallahassee, FL 32399-0250
(850) 245-6536
(850) 245-6127 (Facsimile)

*Attorneys for Defendant Kurt Browning as
Florida Secretary of State*

By: 
Raoul G. Cantero