

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT,  
IN AND FOR LEON COUNTY, FLORIDA

GEORGE WILLIAMS, MEGAN ALLEN,  
KEVIN DOYLE, LORI GOODWIN,  
ADAM TEICHNER, BRIAN ENGLAND,  
MARTHA BAKER, MAGALIE VANCOL PENA,  
ROLANDO TABARES, ALLEN JONES,  
and JUAN BASO, individually and  
on behalf of all other individuals  
similarly situated,

CLASS REPRESENTATION

Plaintiffs,

vs.

CASE NO.: 2011 CA 1584

RICK SCOTT, JEFF ATWATER, and  
PAM BONDI, in their capacities as  
the STATE BOARD OF ADMINISTRATION,  
JEFF ATWATER, as Chief Financial Officer  
of Florida, and JOHN P. MILES, Secretary  
of the Department of Management Services and  
Administrator of the Florida Retirement  
System,

Defendants.

MOTION TO INTERVENE AS PARTY PLAINTIFFS

Potential Intervenor, FLORIDA NURSES ASSOCIATION ("FNA") and DEBORAH HOGAN("HOGAN"), move to intervene in the above-styled matter as party plaintiffs pursuant to Rule 1.230, Florida Rules of Civil Procedure. As grounds for the intervention, the potential intervenors state:

1. Potential Intervenor, FNA, is the state certified collective bargaining agent for the health care professionals employed by the various agencies of the State of Florida. As such the FNA is legally responsible and obligated to negotiate with the State over wages, hours and terms/conditions of employment for more than 3,000 employees who are participants in the Florida Retirement System.

2. The members of the bargaining unit represented by FNA, have a real and direct interest in the pending litigation.

3. Potential Intervenor, HOGAN, is the President of the FNA Professional Health Care Bargaining Unit. She is a Registered Nurse employed by the Florida Department of Health, Palm Beach County Health Department, Community Immunization Service. She is a participant in the Florida Retirement System.

4. The Plaintiffs in this case have consented to the motion. The Defendants have not, at this time, asserted a position on the intervention. Once counsel for the Defendants are identified by the undersigned, an effort to obtain their permission to intervene in the lawsuit will be sought.

5. For the information of the Court and the Defendants, Potential Intervenors FNA and HOGAN adopt:

(a) the complaint for declaratory and injunctive relief as well as the legal positions asserted therein;

(b) the motion for temporary injunction as well as the legal positions asserted therein; and

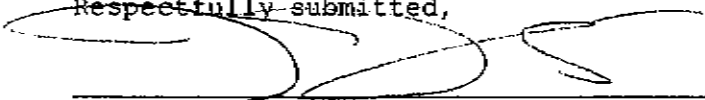
(c) the memorandum of law in support of plaintiffs' motion for temporary injunction as well as the legal positions asserted therein.

WHEREFORE, Potential Intervenors, FLORIDA NURSES ASSOCIATION and DEBORAH HOGAN, requests that the Court grant this motion to intervene.

DATED this 22<sup>nd</sup> day of June, 2011.

Submitted to the Court by U.S. Mail and facsimile transmission to 850/577-4123.


~~Respectfully submitted,~~



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Request to Intervene, has been furnished by mail, to RONALD G. MEYER, Esquire, JENNIFER S. BLOHM, Esquire, and LYNN C. HEARN, Esquire, Meyer, Brooks, Demma and Blohm, P.A., 131 North Gadsden Street, Tallahassee, Florida 32301; PAMELA L. COOPER, Esquire, Florida Education Association, 300 East Park Avenue, Tallahassee, FL 32301; ALICE O'BRIEN, Esquire, National Education Association, 1201 16<sup>th</sup> Street, NW, Washington, D.C. 20036; HONORABLE RICK SCOTT, GOVERNOR, Executive Office of the Governor, 400 South Monroe Street, The Capitol, Tallahassee, Florida 32399-0001; HONORABLE PAM BONDI, ATTORNEY GENERAL, Office of the Attorney General, State of Florida, The Capitol, PL-01, Tallahassee, Florida 32399-1050; HONORABLE JEFF ATWATER, CHIEF FINANCIAL OFFICER, Office of the Chief Financial Officer, Plaza Level 11, The Capitol, Tallahassee, Florida 32399-0300; and to JOHN P. MILES, SECRETARY, Florida Department of Management Services, 4050 Esplanade Way, Suite 250, Tallahassee, Florida 32399-0950, this 22<sup>nd</sup> day of June, 2011.

  
Donald D. Slesnick II