

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,

Plaintiffs,

v.

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.

CLASS REPRESENTAION

Case No. 2011 CA 1584

LEON COUNTY COURT  
LEON COUNTY, FLORIDA

2011 Jun 29 A 10:09

FILED

CONSENT MOTION TO INTERVENE AS PARTY PLAINTIFFS

Potential Interveners, International Union of Police Associations, AFL-CIO, Jason Cannon, Joseph Paduano, and Gary Penny 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 Interveners state:

1. Potential Intervener International Union of Police Associations, AFL-CIO (IUPA) is state certified bargaining agent for law enforcement officers and civilian support personnel employed by the various local governments and political subdivisions of the State of

Florida. As such, the IUPA is legally responsible and obligated to negotiate with local governments and political subdivisions of the State of Florida over wages, hours, and terms and conditions of employment for approximately 1,000 employees who are participants in the Florida Retirement System.

2. Potential Intervener Jason Cannon is a Deputy Sheriff with the St. Lucie County Sheriff's Office. Cannon has been a special risk member of the Florida Retirement System since October, 2005. He is a member of the International Union of Police Associations, AFL-CIO.
3. Potential Intervener Joseph Paduano is an employee of the Broward County Sheriff's Office. Paduano has been a member of the Florida Retirement System since February, 1996. He is a member of the International Union of Police Associations, AFL-CIO.
4. Potential Intervener Gary Penny is an Officer with the Florida Department of Agriculture and Consumer Services. Penny has been a member of the Florida Retirement System since 1985. He is a member of the International Union of Police Associations, AFL-CIO.
5. As members of the Florida Retirement System, IUPA members and the members of the bargaining units represented by the IUPA, including Potential Interveners, Cannon, Paduano, and Penny, have a real and direct interest in the pending litigation.
6. The Plaintiffs and Defendants in this case have consented to the motion.
7. For the information of the Court and Defendants, Potential Interveners IUPA, Cannon, Paduano, and Penny 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;
- c. The Memorandum of Law in Support of Plaintiffs' Motion for Temporary Injunction, as well as the legal positions asserted therein.

WHEREFORE, Potential Interveners IUPA, Cannon, Paduano, and Penny request this Court grant this Motion to Intervene.

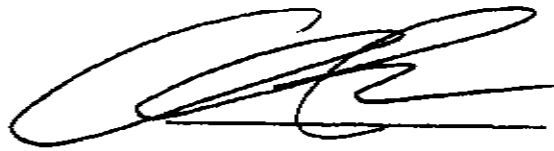


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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been provided **RONALD G. MEYER, ESQ., JENNIFER S. BLOHM, ESQ., AND LYNN C. HEARN, ESQ.**, Meyer, Brooks, Demma, and Blohm, P.A., 131 North Gadsden Street, Tallahassee, Florida 32301;

**PAMELA L. COOPER, ESQ.**, Florida Education Association, 300 East Park Avenue, Tallahassee, Florida 32301; **ALICE O'BRIEN, ESQ.**, National Education Association, 1201 16<sup>th</sup> Street, NW, Washington, D.C. 20036; **BLAINE WINSHIP, ESQ.**, Office of the Attorney General, PL-01m The Capitol, Tallahassee, Florida 32399-1050; and **G. HAL JOHNSON, ESQ.**, 300 East Brevard Street, Tallahassee, Florida 32301, via US Mail on this 28<sup>th</sup> day of June 2011.



Aaron Nisenson