

IN THE CIRCUIT COURT OF THE  
2ND JUDICIAL CIRCUIT IN AND  
FOR LEON COUNTY, FLORIDA

Case No. 2011 CA 1584

GEORGE WILLIAMS, et al., :  
 :  
 Plaintiffs, :  
 :  
 v. :  
 :  
 RICK SCOTT, et al., :  
 :  
 Defendants. :

FILED  
LEON COUNTY, FLORIDA  
CIRCUIT COURT

11 JUN 28 AM 10:59

FILED

BRETT SANDLIN'S  
MOTION TO INTERVENE  
AS PARTY PLAINTIFF

COMES NOW Brett Sandlin, (hereinafter referred to as Sandlin), and files this motion to intervene as a party plaintiff in the captioned case and for grounds would state:

1. This motion is filed pursuant to Fla. R. Civ. P. 1.230.
2. Brett Sandlin is a firefighter employed by Alachua County, Florida. He currently is, and has been, a special risk member of the Florida Retirement System since 1997. He is a member of Local 3852 of the International Association of Fire Fighters, AFL-CIO. Sandlin is a beneficiary of a collective bargaining agreement (CBA) between Alachua County, Florida,

and Local 3852, covering the period October 1, 2010, through September 30, 2013.

3. As a member of the Florida Retirement System, Sandlin has a real and direct interest in the pending litigation.

4. In *City of Orlando v. State Dept. of Ins.*, 528 So. 2d 468 (Fla. 1st DCA 1988); review denied, 537 So. 2d 568 (Fla. 1988), firefighters were recognized as intervenors in regard to the constitutional validity of changes in the Florida Retirement System.

5. Counsel for the plaintiffs in this case has been contacted and agrees to this motion. Blaine Winship, counsel for the defendants, has been contacted and he agrees to this motion.

6. Sandlin seeks to intervene on the side with the plaintiffs and hereby adopts:

(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, Brett Sandlin requests the granting of this motion to intervene.

RICHARD A. SICKING, ESQ.  
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Richard A. Sicking

#### Certificate of Service

I certify that a copy of the foregoing has been furnished by mail this 27<sup>th</sup> day of June, 2011, to: **Ronald G. Meyer, Esquire, Jennifer S. Blohm, Esquire, and Lynn C. Hearn, Esquire, Meyer, Brooks, Demma and Blohm, P.A.,** counsel for the plaintiffs, 131 North Gadsden Street, Tallahassee, FL 32301; **Pamela L. Cooper, Esquire, Florida Education Association, 300 East Park Avenue, Tallahassee, FL 32301; Alice O'Brien, Esquire, National Education Association, 1201 16th Street, N.W., Washington, D.C. 20036; Pam Bondi, Esquire, and Blaine H. Winship, Esquire, Office of the Attorney General, counsel for the defendants, State of Florida, The Capitol, PL-01, Tallahassee, FL 32399-1050; and G. Hal Johnson, Esquire, counsel for intervenors, John Park and Randall Haire, 300 East Brevard Street, Tallahassee, FL 32301.**



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Richard A. Sicking