

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

GEORGE WILLIAMS, *et al.*

Plaintiffs,

v.

CASE NO. 2011 CA 1584

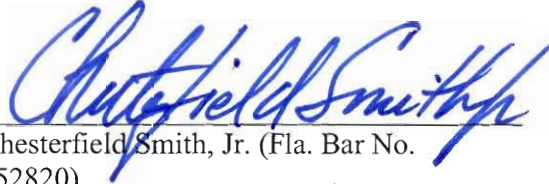
RICK SCOTT, *et al.*,

Defendants.

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 1.510, Florida Rules of Civil Procedure, Defendants Rick Scott, Jeff Atwater, and Pam Bondi, in their capacities as the State Board of Administration, and John P. Miles, in his capacity as the Secretary of the Department of Management Services (collectively, "Defendants"), respectfully submit this Motion for Summary Judgment. As set forth in the accompanying Memorandum of Law in support of this Motion, no contractual rights have been impaired nor has any property been taken as a result of Chapter 2011-68, Laws of Florida ("Chapter 2011-68"), because Chapter 2011-68 operates entirely prospectively and does not retroactively reduce any benefits for any of the Plaintiffs. Moreover, because the Legislature enacted Chapter 2011-68 as a cost-savings measure, thereby requiring fewer appropriations, there has been no unconstitutional impairment with the Plaintiffs' collective bargaining rights. Accordingly, Defendants respectfully submit that all of Plaintiffs' claims should be rejected and summary judgment should be entered in favor of the Defendants.

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of September, 2011, a copy of the foregoing was served by electronic mail and by U.S. Mail upon:

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