

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT,
IN AND FOR ORANGE COUNTY**

JASON WHEAT, et al.,

Plaintiffs,

Case No. 2021-CA-9579-O

v.

ORANGE COUNTY,

Defendant.

_____ /

**MOTION FOR LEAVE TO FILE
AMICUS BRIEF ON BEHALF OF PLAINTIFFS**

The Attorney General respectfully requests leave of this Court to file an amicus brief in support of Plaintiffs. The Attorney General is authorized by law to appear in any suit in which the State has an interest, § 16.01(4)–(5), Fla. Stat., and therefore has a statutory right to appear here. The Attorney General wishes to explain why, in light of the first responder shortage affecting Florida and the entire nation, the public interest favors granting an injunction. The Attorney General also wishes to explain the proper interpretation of Section 381.00316(2), Florida Statutes.

The Plaintiffs consent to this motion. Counsel for Florida contacted counsel for Orange County. Counsel for Orange County responded asking for details about Florida’s brief and seeking additional time. Given the time-sensitive nature of the

petition, and the fact that Orange County terminated its fire chief today, the State wishes to promptly file its amicus brief.

Respectfully submitted,

ASHLEY MOODY
ATTORNEY GENERAL

/s/ Natalie P. Christmas
Natalie P. Christmas (FBN 1019810)
ASSISTANT ATTORNEY GENERAL
Office of the Attorney General
The Capitol, PL-01
Tallahassee, FL 32399
(850) 414-3300; (850) 410-2672 (fax)
natalie.christmas@myfloridalegal.com

Counsel for the State of Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies have been furnished by email service or via filing with the Florida Courts E-Filing Portal on October 20, 2021, to the following:

Rachel Rodriguez
rlt@toikkalawgroup.com

Marc A. Sugerman
msugerman@anblaw.com

Mark E. Levitt
mlevitt@anblaw.com

/s/ Natalie P. Christmas

Natalie P. Christmas