

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

CONGRESSWOMAN CORRINE BROWN,
JOHNNY BROWN, THEODORE BROWN,
MARY LAWSON BROWN, MARY L. GEORGE,
CRYSTAL R. BROWN, JUSTIN CAMPBELL,
FERRILL HILL, MARGIE KELLY CODY,
JOSEPHINE HALL, SANDRA JACKSON,
MAMIE JACKSON, WILFRED W. REDDICK,
JR., SHANTEZ ROBINSON, CARRIE DAVIS,
JEAN REDDICK, ALVIN SHEPARD, CURTIS
WALKER, PHYLLIS JOHNSON, JEROME
BROWN, JOANN M. BROWN, HAZEL D. GILLIS,
ANTONIA G. BRYANT, EULIE B. JOHNSON,
LAVONNE P. MITCHELL, DARRYL MACK,
ANTHONY MACK, DORETHA MACK, CONSTANCE
S. HALL, SHAKUR ALI, MICHAEL ASHLEY,
LAWRENCE AVERBECK, ANITA BAILEY, LEON
BERRIER, DANIEL L. COLE, JASMINE CROMWELL,
TRICIA DUNLAP, LA' DAISHA EVANS, JAMES
FREEMAN, RUSSELL T. GASKIN, CLARETHA S.
HICKS, TEVIN HENDERSON, MITZI HUTCHINSON,
ANGELIQUE MATTHEWS, ANNA MCLAUGHLIN,
EDWIN MERRITT, LILLIE P. POWELL, TAURICE
RICKS, DEVIN ROBERTS, CARY P. ROBINSON,
ALEXANDRA SAFFICE, SHAKA SHABAZZ, FELICIA
SMITH, RICHARD ALAN SPAULDING, WILLIE
THOMAS, TEAONNDA THOMPSON, RODERIC
TURNER, MARY S. ADAMS, JOY GREGORY, WILBERT
GREGORY, CARLOTTA L. GUYTON, LUELLE
MCQUEEN, DOROTHY M. OLIVER, JACOBY
PITTMAN, BARON RIVERS, KIMBERLY RIVERS,
ANMENIA SHAHAB, NEEMA YA NATHIERI,
MELVIN A. PHILPOT, VELMA WILLIAMS,
BEVERLYE COLSON NEAL, TYRONE FIELDS,
GLORIA R. GREEN, MAXINE S. HIXON, REBECCA
JOHNSON, NEVA SPANN-KIRKLAND, SUSIE L.
JOHNSON HARRIS, EDDIE L. JAMES, BENTLEY
M. CAREY, DWYCE L. ROSS, KENNETH WALKER,
TIFFANY WARE, VANESSA WILLIAMS, CHARITA FINCH,

Case No.: 4:15-cv-00398-MW-CAS

LAVENIA MAY, DR. ROLOUS A. FRAZIER, JR., DOROTHY FLUITT, SHEILA B. SMITH, CLARISE REDDICK, DAISY BALES, CONSTANCE BANGO, DELORIS R. SHEPHERD, VERNON MCQUEEN, HERBERT WILLIAMS JR., ROD ZEIGLER, ROYCE FLAGLER, MABLE BUTLER, JEAN CAMPBELL, WILLIE CAMPBELL, ELLA MAE CAMPBELL, KALEIGH CAMPBELL, MIA CAMPBELL, WALTER DULES WILLIAMS, LULA COOKS WILLIAMS, ROBERTA WILLIAMS, DANIEL J. WILLIAMS, IDA M. CARSON, JUANITA SANDERS, CHERYLL DANIELS, EDDIE A. BENN, RICH SLEET, MARIA T. BARNES, ALLEN WIGGINS, HENRIETTA J. TICE, JASMINE MCKAY, LATOYA DAVIS, AND LULA DAVIS,

Plaintiffs,

vs.

**KEN DETZNER, in his official capacity as
Secretary of State of the State of Florida,
THE FLORIDA SENATE and THE
FLORIDA HOUSE OF REPRESENTATIVES,**

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE
CONSOLIDATED RESPONSE TO
DEFENDANTS' MOTIONS FOR ATTORNEY'S FEES AND
SANCTIONS (DOCS. 82 AND 84)**

Plaintiffs, by and through undersigned counsel, hereby move this Honorable Court to enter its Order allowing Plaintiffs to file a consolidated response to Intervenor's Motions to for Rule 11 Sanctions and Motion to Determine Entitlement to Attorneys' Fees Expert Witness Fees. (Doc. 84 and 82). In support thereof, Plaintiffs state as follows:

1. On April 27, 2016, the Intervenor's filed a Motion for Rule 11 Sanctions alleging that Plaintiffs had brought frivolous claims in their verified complaint. (Doc. 82).

2. On May 3, 2016, the Intervenor's also filed a Motion to Entitlement to Attorneys' Fees and Expert Witness Fees alleging substantially the same claims as their previous motion. (Doc. 84).

3. The facts of the respective responses arise from the same nucleus of operative facts and involve the same legal issues and principles.

4. Accordingly, Plaintiffs seek to file a consolidated response to Intervenor's motions. Attached hereto as Exhibit A.

5. Undersigned counsel has conferred with counsel for the Intervenor's, who have authorized undersigned counsel to represent that they do not oppose the relief requested in this motion.

6. The best interests of justice and judicial economy will be served by entry of an Order granting the requested relief.

WHEREFORE, the Plaintiffs respectfully request this Honorable Court to enter its Order to allow Plaintiffs to file a consolidated Response to the Intervenor's motions.

MEMORANDUM OF LAW

The Court has discretion to grant the relief requested herein, for which good cause has been shown. The ends of justice and efficiency warrant the continuance sought and the Intervenor's have no objection. Accordingly, the Court should grant the relief requested in the above motion.

Respectfully submitted,

/s/ Wm. J. Sheppard

Wm. J. Sheppard, Esquire
Florida Bar No.: 109154
Elizabeth L. White, Esquire
Florida Bar No.: 314560
Matthew R. Kachergus, Esquire
Florida Bar No.: 503282
Bryan E. DeMaggio, Esquire
Florida Bar No.: 055712
Jesse B. Wilkison, Esquire
Florida Bar No.: 118505
Sheppard, White, Kachergus & DeMaggio, P.A.
215 Washington Street
Jacksonville, Florida 32202
Telephone: (904) 356-9661
Facsimile: (904) 356-9667
Email: sheplaw@att.net
COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 11, 2016, I electronically filed the foregoing with the Clerk of the Court by using CM/ECF System which will send a notice of electronic filing to the following:

**Adam S. Tanenbaum, Esquire
General Counsel
Florida Department of State
500 South Bronough Street, Suite 100
Tallahassee, Florida 32399-0250**

**David A. Fugett, Esquire
Assistant General Counsel
Florida Department of State
500 South Bronough Street, Suite 100
Tallahassee, Florida 32399-0250**

**Jason N. Zakia, Esquire
Jesse L. Green, Esquire
Raoul G. Cantero, Esquire
Wachovia Financial Center
Suite 4900
200 South Biscayne Boulevard
Miami, Florida 33131**

**Andy V. Bardos, Esquire
Gray Robinson, P.A.
301 South Bronough Street, Suite 600
Tallahassee, Florida 32301**

**David B. King, Esquire
Thomas A. Zehnder, Esquire
Vincent Falcone III, Esquire
King Blackwell Zehnder, et al.
25 East Pine Street
Orlando, Florida 32801**

I HEREBY CERTIFY that on May 11, 2016, a true and correct copy of the foregoing document and the notice of electronic filing was sent by United States Mail to the following non-CM/ECF participants:

N/A

/s/ Wm. J. Sheppard
ATTORNEY

ldh[brown.corrine.consolidate.motion.northern]