

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

RENE ROMO, an individual; BENJAMIN
WEAVER, an individual; *et al.*,

Plaintiffs,

vs.

Case No.: 2012-CA-00412 ✓

KEN DETZNER, in his official capacity as
Florida Secretary of State, and PAMELA
JO BONDI, in her official capacity as
Attorney General,

Defendants.

THE LEAGUE OF WOMEN VOTERS OF FLORIDA;
THE NATIONAL COUNCIL OF LA RAZA;
et al.,

Plaintiffs,

v.

Case No.: 2012-CA-00490

KEN DETZNER, in his official capacity
as Florida Secretary of State; THE FLORIDA SENATE;
et al.,

Defendants.

**THE SECRETARY'S MOTION TO DISMISS
ROMO PLAINTIFFS' AMENDED COMPLAINT**

Defendant, Ken Detzner, in his official capacity as Florida Secretary of State (the "Secretary"), pursuant to Florida Rule of Civil Procedure 1.140(b), moves to dismiss the Amended Complaint filed by Plaintiffs Romo, *et al.*, on March 7, 2012. The Secretary adopts the arguments set forth in the Florida House of Representatives and Florida Senate's Joint

2012 FEB 26 PM 2:31

FILED

IN COMPUTER
D.B.

Motion to Dismiss Romo Plaintiffs' Amended Complaint, filed on March 23, 2012, and incorporates those arguments herein.

WHEREFORE, the Secretary respectfully requests that the Court dismiss the Romo Plaintiffs' Amended Complaint.

Respectfully submitted,



DANIEL E. NORDBY
General Counsel
Florida Bar No. 14588
Daniel.Nordby@DOS.MyFlorida.com

ASHLEY E. DAVIS
Assistant General Counsel
Florida Bar No. 48032
Ashley.Davis@DOS.MyFlorida.com
Florida Department of State
R.A. Gray Building
500 South Bronough Street
Suite 100
Tallahassee, Florida 32399-0250
Telephone (850) 245-6536
Facsimile (850) 245-6127

*Counsel for Defendant
Secretary of State*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by email this 26th day of March, 2012, on the following:

Blaine H. Winship
Timothy D. Osterhaus
Office of the Attorney General
PL-01, The Capitol
Tallahassee, Florida 32399-0400
blaine.winship@myfloridalegal.com
timothy.osterhaus@myfloridalegal.com

Counsel for Attorney General Bondi

George T. Levesque
Florida House of Representatives
422 The Capitol
Tallahassee, Florida 32399-1300
george.levesque@myfloridahouse.gov

Miguel De Grandy
800 Douglas Road, Suite 850
Coral Gables, Florida 33134
mad@degrandylaw.com

Andy Bardos
The Florida Senate
404 South Monroe Street, Suite 409
Tallahassee, Florida 32399
bardos.Andy@flsenate.gov

Michael Carvin
Louis K. Fisher
Jones Day
51 Louisiana Ave N.W.
Washington, D.C. 20001
macarvin@jonesday.com
lkfisher@jonesday.com

Cynthia Tunnicliff
Peter Dunbar
Pennington, Moore, et al.
215 South Monroe Street, Second Floor
Tallahassee, Florida 32301
cynthia@penningtonlaw.com
pete@penningtonlaw.com

Counsel for the Florida Senate

Ronald Meyer
Meyer, Brooks, Demma, and Blohm, P.A.
131 North Gadsden Street
P.O. Box 1547
Tallahassee, Florida 32301

J. Gerald Hebert
191 Somerville Street, #415
Alexandra, VA 22304
hebert@voterlaw.org

Paul Smith
Michael DeSanctis
Jessica Ring Amunson
Kristen Rogers
Jenner & Block, LLP
1099 New York Ave NW, Suite 900
Washington, D.C. 20001
psmith@jenner.com
mdesanctis@jenner.com
jamunson@jenner.com
krogers@jenner.com

Charles Wells
George Meros
Jason Unger
Allen Winsor
Charles B. Upton, II
GrayRobinson, P.A.
P.O. Box 11189
Tallahassee, Florida 32302
charles.wells@gray-robinson.com
george.meros@gray-robinson.com
jason.unger@gray-robinson.com
allen.winsor@gray-robinson.com
cb.upton@gray-robinson.com

Counsel for the Florida House of Representatives


Joseph Hatchett
Akerman Senterfitt
106 E. College Ave, Suite 1200
Tallahassee, Florida 32301
joseph.hatchett@akerman.com

Jon L. Mills
Karen C. Dyer
Elan M. Nehleber
Boies Schiller & Flexner, LLP
100 SE 2nd Street, Suite 2800
Miami, Florida 33131
jmills@bsflp.com
kdyer@bsflp.com
enehleber@bsflp.com

Counsel for the Romo Plaintiffs

Marc Elias
Kevin Hamilton
John Devaney
Abha Khanna
Perkins Coie, LLP
700 13th Street NW, Suite 600
Washington, D.C. 20005
melias@perkinscoie.com
khamilton@perkinscoie.com
jdevaney@perkinscoie.com
akhanna@perkinscoie.com

*Counsel for the League of Women Voters of
Florida Plaintiffs*


Attorney