

**IN THE SUPREME COURT OF FLORIDA
CASE NO. SC11-1611**

AMANDA JEAN HALL,

Petitioner,

v.

R.J. REYNOLDS TOBACCO
COMPANY,

Respondent.

**ATTORNEY GENERAL’S MOTION FOR LEAVE TO FILE A
BRIEF AS AMICUS CURIAE IN SUPPORT OF RESPONDENT**

Pursuant to Florida Rule of Appellate Procedure 9.370, the Attorney General, on behalf of the State of Florida, moves for leave to file a brief as amicus curiae in support of Respondent, R.J. Reynolds Tobacco Company, and states:

1. As Florida’s chief legal officer, the Attorney General “[s]hall appear in and attend to, in behalf of the state, all suits or prosecutions, civil or criminal or in equity, in which the state may be a party, or in anywise interested, in the Supreme Court and district courts of appeal of this state.” § 16.01(4), Fla. Stat.

2. In this case, the State has an interest in the constitutionality of section 569.23, Florida Statutes, which protects the State’s settlement with certain tobacco companies by providing caps on supersedeas bonds for those companies. The Attorney General intervened in the trial court and submitted a memorandum

showing the past and projected revenue stream from the Tobacco Settlement and the public purpose served by section 569.23(3), Florida Statutes.

3. The State's brief will be limited to demonstrating the important, statewide public purpose underlying section 569.23(3), Florida Statutes.

4. The State's brief will assist the Court by discussing the statewide financial impact of the Tobacco Settlement, and the public purpose behind section 569.23(3), Florida Statutes.

5. Counsel for Petitioner and Respondent have been contacted and do not object to the granting of this motion.

Respectfully Submitted,

PAMELA JO BONDI
ATTORNEY GENERAL

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CERTIFICATE OF SERVICE

I certify that a copy of this motion has been furnished to the following persons via e-mail this 23d day of April, 2012:¹

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¹ The parties have agreed to accept service by e-mail at the e-mail addresses listed herein in lieu of service by U.S. mail and have further agreed that electronic service will be deemed service by mail for purposes of Florida Rule of Appellate Procedure 9.420.

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