

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

AMANDA JEAN HALL,

Petitioner,

v.

R.J. REYNOLDS TOBACCO  
COMPANY,

Respondent.

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**UNOPPOSED MOTION FOR LEAVE  
TO APPEAR AS AMICI CURIAE IN SUPPORT OF RESPONDENT**

Pursuant to Florida Rule of Appellate Procedure 9.370, the American Tort Reform Association (“ATRA”) and the Florida Justice Reform Institute (“FJRI”) move for leave to appear as *amici curiae* in support of Respondent, R.J. Reynolds Tobacco Company.

**Movant’s Interest**

ATRA is a non-profit, non-partisan organization created in 1986, dedicated exclusively to reforming the civil justice system. ATRA represents more than 300 businesses, corporations, municipalities, associations, and professional firms. ATRA is especially concerned with costs that excessive civil litigation impose on society. ATRA has been actively involved in the passage of appeal bond legislation in dozens of states, including Florida.

The Florida Justice Reform Institute is an organization of concerned citizens, small business owners, business leaders, doctors, and lawyers, all working toward the common goal of restoring predictability and personal responsibility to civil justice in Florida. The Florida Justice Reform Institute works to restore faith in the Florida judicial system and protect Floridians from the social and economic toll that is incurred from rampant litigation. It is the first independent organization focused solely on civil justice in Florida.

ATRA and the Florida Justice Reform Institute have a particular interest in this case because the constitutional challenge to Florida's Settlement Agreement Bond Cap, § 569.23, Fla. Stat., directly implicates their mission to help improve the fairness, predictability, and efficiency of America's and Florida's civil justice system.

ATRA and the Florida Justice Reform Institute seek leave to file an *amicus curiae* brief to provide this Court with their additional perspective, formed from years of experience with users of the court system, that the Florida legislature's prerogative to enact substantive reform of the court system should be protected. ATRA and the Florida Justice Reform Institute believe Plaintiffs' constitutional challenge to Florida's Settlement Agreement Bond Cap threatens to erode the comity between the legislative and judicial branches, adversely affecting Florida's citizens and businesses, and its legal profession.

**Statement Regarding Parties' Consent**

Pursuant to Rule 9.370, the undersigned conferred with the parties. The parties have all consented to ATRA and FJRI's *amicus* participation.

**WHEREFORE**, ATRA and FJRI respectfully request that this Court grant their motion for leave to submit a brief as *amici curiae* in support of Respondent, R.J. Reynolds Tobacco Company.

Respectfully submitted,

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George N. Meros, Jr.  
Florida Bar No. 263321  
Charles Burns Upton II  
Florida Bar No. 0037241  
GrayRobinson, P.A.  
Post Office Box 11189  
Tallahassee, Florida 32302-3189  
Telephone: 850-577-9090  
Facsimile: 850-577-3311  
Email: gmeros@gray-robinson.com  
cb.upton@gray-robinson.com  
*Attorneys for Amici Curiae, the American  
Tort Reform Association and the Florida  
Justice Reform Institute*

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail on the following on June 8, 2012:

Rod Smith  
Mark Avera  
Dawn M. Vallejos-Nichols  
2814 SW 13th Street  
Gainesville, Florida 32608  
*Counsel for Petitioner*

John S. Mills  
Courtney Brewer  
203 North Gadsden Street, Suite 1A  
Tallahassee, Florida 32301  
*Counsel for Petitioner*

Gregory G. Katsas  
Charles R.A. Morse  
Jones Day  
51 Louisiana Avenue N.W.  
Washington, D.C. 20001  
*Counsel for Respondent*

Elliot H. Scherker  
Julissa Rodriguez  
Greenberg Traurig, P.A.  
Wells Fargo Center, Suite 4400  
300 Southeast Second Avenue  
Miami, Florida 33131  
*Counsel for Respondent*

Steven L. Brannock  
Celene H. Humphries  
Tyler K. Pitchford  
Brannock & Humphries  
100 South Ashley Drive, Suite 1130  
Tampa, Florida 33602  
*Attorneys for Engle Plaintiff Amici*

Louis F. Hubener  
Chief Deputy Solicitor General  
Rachel E. Nordby  
Deputy Solicitor General  
Office of the Attorney General  
The Capitol, PL-01  
Tallahassee, FL 32399-1050

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George N. Meros, Jr.  
Florida Bar No. 263321  
Charles Burns Upton II  
Florida Bar No. 0037241  
GrayRobinson, P.A.