

SUPREME COURT OF FLORIDA

Nos. SC13-1930; SC13-1976

BRADLEY WESPHAL,

Plaintiff-Appellant,

Lower Tribunal Case No(s).
1D12-3563; 10-019508SLR

v.

City of St. Petersburg/
City of St. Petersburg Risk Management &
State of Florida,

Defendants-Appellees.

**VERIFIED MOTION FOR ADMISSION TO APPEAR
PRO HAC VICE PURSUANT TO FLORIDA RULE
OF JUDICIAL ADMINISTRATION 2.510**

Comes now Andre M. Mura, Movant herein, and respectfully represents the following:

1. Movant resides in Washington, DC. He is not a resident of the State of Florida.

2. Movant is an attorney and a member of the law firm of the Center for Constitutional Litigation, P.C., with offices at 777 6th Street, N.W., Suite 520, Washington, DC 20001. His telephone is (202) 944-2860 and his fax number is (202) 965-0920.

3. Movant has been retained personally or as a member of the above named law firm on April 9, 2013 by amicus curiae the American Association for Justice to

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JULY 17 2013
2013 DEC 19 AM 11:46
CLERK OF THE COURT
BY _____

provide legal representation in connection with the above-styled matter now pending before the above-named court of the State of Florida.

4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdiction(s):

District of Columbia	492837	06-06-05
US Dist. Ct. D. DC		5-1-06
US Ct. of Appeals - 5 th Circuit		11-14-08
US Ct. of Appeals - 9 th Circuit		12-21-07
US Ct. of Appeals - 11 th Circuit		05-09-07
US Ct. of Appeals - DC Circuit		04-01-13
US Supreme Court		06-15-09
US Court of Appeals - Fed. Circuit		04-21-10

5. There are no disciplinary proceedings pending against Movant.

6. Within the past five (5) years, Movant has not been subject to any disciplinary proceedings.

7. Movant has never been subject to any suspension proceedings.

8. Movant has never been subject to any disbarment proceedings.

9. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

10. Movant is not an inactive member of The Florida Bar.

11. Movant is not now a member of The Florida Bar.

12. Movant is not a suspended member of The Florida Bar.

13. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation from The Florida Bar.

14. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of Judicial Administration 2.510.

15. Movant has filed motion(s) to appear as counsel in Florida state courts during the past five (5) years in the following matters:

Supreme Court	McMinn v. Cox	SC09-1073
First District Court of Appeal	St. Onge v. White & Enterprise	1D07-5763
First District Court of Appeal	Westphal v. City of St. Petersburg	1D12-3563

16. Local counsel of record associated with Movant in this matter is James F. Fee, Jr., Florida Bar Number 0802794, who is an active member in good standing of The Florida Bar and has offices at Courthouse Tower, Suite 235, 44 Flagler Street, Miami, Florida 33130.

17. Movant has read the applicable provisions of Florida Rule of Judicial Administration 2.510 and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

18. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

19. Movant has sent a check in the amount of \$250 to The Florida Bar and a check in the amount of \$100 to the Clerk of the Court for the Supreme Court of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.

Date: December 18, 2013

Respectfully submitted,

/s/Andre M. Mura
Andre M. Mura
Center for Constitutional
Litigation, P.C.
777 6th Street, N.W.
Suite 520
Washington, DC 20001
Phone: (202) 944-2860
Fax: (202) 965-0920
andre.mura@cclfirm.com

DISTRICT OF COLUMBIA:

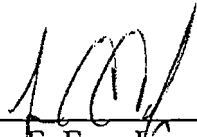
I, Andre M. Mura, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief.

/s/Andre M. Mura
Andre M. Mura

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Judicial Administration 2.510.

Date: December 17, 2013

Respectfully submitted,

/s/ 
James F. Fee, Jr.
Druckman & Fee, P.A.
Courthouse Tower
Suite 235
44 West Flagler Street
Miami, FL 33130
Phone: (305) 374-7750
Fax: (305) 374-7751
jfeedfc@bellsouth.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of December, 2013, a true and correct copy of the foregoing Verified Motion for Admission to Appear Pro Hac Vice Pursuant to Florida Rule of Judicial Administration 2.510 was sent via United Parcel Service to PHV Admissions, The Florida Bar, 651 East Jefferson Street, Tallahassee, Florida 32399-2333 accompanied by payment of the \$250.00 filing fee made payable to The Florida Bar and that a copy of this motion was served via electronic mail delivery to Richard A. Sicking, Esq. (sickingpa@aol.com), co-counsel for petitioner, 1313 Ponce De Leon Blvd., Suite 300, Coral Gables, FL 33134; Jason Fox, Esq. (JayfoxEsq@aol.com), Law Offices of Carlson and Meissner, co-counsel for petitioner, 250 N. Beicher Rd., Suite 102, Clearwater, FL 33765; Bill McCabe, Esq. (billjmccabe@earthlink.net) 1250 South Highway 17/92, Suite 210, Longwood, FL 32750; Geoffrey Bichler, Esq. (geoff@bichlerlaw.com), Bichler, Kelley, Oliver & Longo, PLLC, 541 South Orlando Avenue, Suite 310, Maitland, FL 32751; Mark L. Zientz, Esq. (mark.zientz@mzlaw.com), Two Datan Center, 9130 S. Dadeland Blvd, Suite 1619, Miami, FL 33156; Richard W. Ervin, III (richard.ervin@flappeal.com), 1201 Hay Street, Suite 1000, Tallahassee, FL 32301; Kimberly Proano, Esq. (Kimberly.Proano@stpete.org), Office of the City Attorney, counsel for respondent, City of St. Petersburg, P.O. Box 2842, St. Petersburg, FL 33731; Allen Winsor, Chief Deputy Solicitor General

(allen.winsor@myfloridalegal.com), counsel for respondent, State of Florida,
Office of the Attorney General, The Capitol, PL-0 1, Tallahassee, FL 32399-1 050;
William H. Rogner, Esq. (wrogner@hrmcw.com); Hurley Rogner Miller Cox
Waranch & Westcott.

/s/Andre M. Mura
Andre M. Mura