

IN THE SUPREME COURT OF FLORIDA

WILLIAM WILLIAMS,  
Petitioner,

CASE NO. : SC15-1417

vs.

STATE OF FLORIDA,  
Respondent.

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**CORRECTED MOTION BY THE FLORIDA PROSECUTING ATTORNEY'S  
ASSOCIATION FOR LEAVE TO FILE AMICUS CURIAE BRIEF**

The Florida Prosecuting Attorney's Association (FPAA), by and through the undersigned attorneys, and pursuant to Florida Rule of Appellate Procedure 9.370(a), hereby moves the Court for leave to file an amicus brief on behalf of the FPAA membership, and would state as follows:

1. The FPAA is a nonprofit corporation whose members are the 20 elected State Attorneys and over 2000 Assistant State Attorneys. They are concerned about matters which involve the criminal justice system in Florida. The matter pending before the Court involves an issue that is significant to the FPAA and its members and the FPAA supports the Respondent State of Florida and the constitutionality of section 316.1939, Florida Statutes.

2. Aaron Delgado, Esq., counsel for the Petitioner, has been contacted and advises that he does not oppose the motion. Kristen Davenport, Esq., counsel for the Respondent has been contacted and advises that she supports the motion.

Tracey Woods, Esq., counsel for Amici Curiae National College for DUI Defense has been contacted and advises that she does not object to the motion. Sonya Rudenstine, Esq., counsel for FACDL has been contacted and advises that she does not object to the motion.

WHEREFORE, the FPAA respectfully requests that they be allowed to file an amicus brief in this matter.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail to Aaron D. Delgado, Esquire at adelgado@communitylawfirm.com, Eric A. Latinsky, Esquire at elatinsky@communitylawfirm.com and Robert W. Rawlins, Esquire at rrawlins@communitylawfirm.com (Counsel for Petitioner), Kristen Davenport, Esquire, at kristen.davenport@myfloridalegal.com (Counsel for Respondent), Tracey Wood, Esquire, at tracey@traceywood.com (Counsel for Amici Curiae National College for DUI Defense), and Sonya Rudenstine, Esquire at srudenstine@yahoo.com and Karen Gottlieb, Esquire at kgottlie@fiu.edu (Counsel for Amici Curiae FACDL) this 14th day of April, 2016.

Respectfully Submitted,

/s/ Arthur I. Jacobs

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/s/ Ben Fox

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