

IN THE SUPREME COURT OF FLORIDA

CITY OF AVENTURA, et al.,

Respondents,

Case No. SC16-1976

vs.

LUIS TORRES JIMENEZ,

Petitioner. _____/

ON DISCRETIONARY REVIEW FROM
THE THIRD DISTRICT COURT OF APPEAL

Lower Case Nos. 3D15-2303; 3D15-2271

NOTICE OF RELATED CASE

Petitioner, Luis Torres Jimenez, hereby gives notice that a notice to invoke this Court's discretionary jurisdiction was recently filed in the Second District in the matter of *City of Oldsmar v. Trinh*, No. 2D15-4898, 41 Fla. L. Weekly D2435a (Oct. 28, 2016). The Second District's decision in *Trinh* bears significant relationship to the decision in the instant case in that it also passes on the lawfulness of a local government's private outsourcing of its statutorily mandated responsibilities for the enforcement of Florida's red-light camera traffic laws. Both the Third District in this case and the Second District in *Trinh* reached a different conclusion than the Fourth District in *City of Hollywood v. Arem*, 41 Fla. L. Weekly D1753 (July 27, 2016), on this question, with the Third District

certifying three questions of great public importance and the Second District certifying conflict with the Fourth District in *Arem*.

Additionally, undersigned counsel would note that they represent the petitioners in both this case and in *Trinh* and that the respondents and their counsel are the same in both cases.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent delivered by email this 1st day of November, 2016 to: **Edward G. Guedes**, Weiss Serota Helfman Cole & Boniske, P.L., 2525 Ponce de Leon Blvd., Suite 700, Coral Gables, Florida 33134, eguedes@wsh-law.com, szavala@wsh-law.com; **Samuel I. Zeskind**, Weiss Serota Helfman Cole & Boniske, P.L., 2525 Ponce de Leon Blvd., Suite 700, Coral Gables, Florida 33134, szeskind@wsh-law.com, ozuniga@wsh-law.com; **Robert Dietz**, Office of the Attorney General, 501 E. Kennedy Blvd., Suite 1100, Tampa, Florida 33134, Robert.Dietz@myfloridalegal.com.

Respectfully submitted,

/s/ Stephen F. Rosenthal

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