

**IN THE SUPREME COURT OF FLORIDA**  
**SUPREME CT NO: SC18-1287**  
DCA NO: 1D18-3260  
L.T. CASE NO: 2018 CA 1114

**DEPARTMENT OF STATE, etc., et al.,**

**Appellants,**

**v.**

**FLORIDA GREYHOUND ASSOCIATION,  
INC., et al,**

**Appellees.**

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**REQUEST BY THE COMMITTEE TO PROTECT DOGS  
FOR ADDITIONAL TIME TO APPEAR AT ORAL ARGUMENT**

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The Committee to Protect Dogs, Amicus in these proceedings on behalf of Appellants, requests the Court to allow it five minutes to appear at oral argument, and says:

1. The Committee to Protect Dogs (“Committee”), is a political committee that represents the interests of many Floridians who object to the practice of wagering on the outcome of dog races.

2. The Committee is operated and funded by GREY2K USA Worldwide, The Humane Society of the United States, and other similarly situated advocates of Amendment 13.

3. The Committee was the moving force of the CRC proposed constitutional amendment that is the subject of these proceedings.

4. The Committee, through its principals, expended significant time and energy advocating for the CRC to propose Amendment 13 for the November 2018 ballot, and is vitally interested in the opportunity for the public to vote on the proposal.

5. The Committee has entered into numerous contracts, retained consultants, and spent considerable time organizing volunteers in preparation for the November 2018 election.

6. As principal proponent of Amendment 13, and the main political supporting organization, the Committee has substantial interest in the outcome of this appeal and would like to be heard by the Court, if only briefly.

7. The Committee has advanced a distinct position and believes its perspective at argument may be helpful to the Court.

8. The Committee requests five minutes of additional oral argument time to address the Court and respond to questions.

9. The Committee requested Appellants' counsel to cede a few minutes of this oral argument time for the Committee's counsel to argue, but Appellants' counsel was unable to agree.

10. However, Appellant's counsel has no objection to the Court granting an additional five minutes for the Committee to argue.

11. In *Alachua County v. Expedia* (Supreme Court Case No. 13-838), the Court granted a Motion seeking leave to appear at oral argument, permitting amici to present argument to the Court.

Wherefore, the Committee requests the Court to grant an additional five minutes of oral argument time for it to appear at argument before the Court on behalf of Appellants' position that the public should be allowed to vote on Amendment 13.

Respectfully submitted this 21st day of August, 2018.

*s/ M. Stephen Turner*

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the original of the foregoing has been filed through the Florida Courts E-Filing Portal, and a true and correct copy served by E-Mail on the parties listed below, this 21st day of August, 2018.

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