

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Petitioner,

v.

Supreme Court Case No. SC2018-149

TIKD SERVICES LLC,
a Foreign Limited Liability
Company, and CHRISTOPHER
RILEY, individually and as
Founder of TIKD SERVICES LLC,

The Florida Bar File Nos.
20174035(11B) and 20174045(11B)

Respondents.

**MOTION OF AMICI CURIAE,
THE FLORIDA PRIVATE PRACTICE LAWYERS,
FOR LEAVE TO PARTICIPATE IN ORAL ARGUMENT**

Pursuant to Rule 9.320, Fla. R. App. P., Movants, Gold & Associates, P.A. d/b/a The Ticket Clinic, Joseph LoRusso, P.A., The Law Offices of Lou Arslanian, Steven Bell, Esq., and The Law Offices of H. A. Rodriguez, who are *amici curiae* in the above-entitled matter, hereby respectfully request that this Court grant them leave to participate in oral argument in this matter, should oral argument be granted. In support of this Motion, Movants state as follows:

1 The Amicus Brief filed by Movants supports the position taken by Petitioner, The Florida Bar (“The Bar”), that Respondents, TIKD Services, LLC and Christopher Riley (collectively, “TIKD”), are engaged in the unlicensed practice of law (“UPL”).

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2. Movants' Amicus Brief makes numerous points, advances legal theories, and identifies significant real-world issues raised by TIKD's business practices, including misleading advertising, fee-splitting, onerous limitations on client remedies, and actual harm to consumers. These matters have not been discussed or thoroughly analyzed in the briefs filed by The Bar, TIKD, or the *amici curiae* supporting TIKD.¹ As a result, Movants believe that their position will not be represented adequately at the hearing unless they are afforded a brief opportunity to argue orally.

3. This case presents questions of vital importance to Florida consumers of legal services and to Florida lawyers engaged in private practice: may non-lawyers sell legal services to Florida consumers, and may they do so without complying with the Rules Regulating the Florida Bar? Movants are particularly well positioned to provide insight into these questions. One of them (*i.e.*, The Ticket Clinic) is a direct competitor of TIKD, and one of The Ticket Clinic's attorneys, Ted Hollander, Esq., filed the first UPL complaint against TIKD by a private practice attorney in Florida.

¹ The other *amici curiae*, Center for Public Interest Law and the Consumers for a Responsive Legal System, filed a brief supporting Respondents TIKD Services LLC and Christopher Riley.

4. Movants' specific knowledge and experience as lawyers defending traffic tickets in Florida and competing with TIKD would be of great value to the Court in this matter.

5. Moreover, Movants seek only five (5) minutes of oral argument time, which they believe will be sufficient to address key matters raised in their Brief but concise enough so as not to lengthen unnecessarily the hearing in this matter.

6. This Court has granted oral argument to *amici curiae* in other proceedings involving matters of significant public interest. *See, e.g., Bainter v. League of Women Voters of Fla.*, No. SC14-1200 (Order) (Fla. Sept. 2, 2014) (attached hereto as Exhibit A). Similar interests justify granting this Motion.

Request for Consent

7. Movants certify that (1) Petitioner, The Florida Bar, takes no position as to this Motion; and (2) Respondents, TIKD Services LLC and Christopher Riley, oppose this Motion.

WHEREFORE, Movants respectfully request that this Court, should it grant oral argument in this matter, additionally grant Movants the opportunity to participate in oral argument.

Dated: August 23, 2019.

Respectfully submitted,

THOMAS & LOCICERO PL

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been filed on this 23rd day of August, 2019, via the statewide e-portal and true and correct copies were furnished via email using the statewide e-portal to

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EXHIBIT A

Supreme Court of Florida

TUESDAY, SEPTEMBER 2, 2014

CASE NO.: SC14-1200

Lower Tribunal No(s): 1D14-2163;
2012-CA-00412;
2012-CA-00490;
2012-CA-2842

PAT BAINTER, ET AL., AS NON-
PARTIES


vs. LEAGUE OF WOMEN VOTERS
OF FLORIDA, ET AL.

Appellant(s)

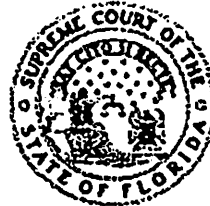
Appellee(s)

Upon further consideration, the motion to participate in oral argument filed by the Media, as amici curiae in support of the appellees, is hereby granted. A maximum of ten minutes has been allocated for the above-mentioned amici's argument and an additional ten minutes for the appellants' response to the amici's argument.

A True Copy
Test:



John A. Tomasino
Clerk, Supreme Court



bb
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EXHIBIT A

CASE NO.: SC14-1200

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