

**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.

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**AMENDED RENEWED 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 (the “Florida Private Practice Amici”), hereby respectfully renew their request that the Court grant them leave to participate in oral argument in this matter. In support of this Renewed Motion, the Florida Private Practice Amici state as follows:

1. On February 2, 2019, the Court granted the Florida Private Practice Amici leave to appear as *amici curiae* in this matter.

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2. On August 23, 2019, the Florida Private Practice Amici filed their Motion Of *Amici Curiae*, The Florida Private Practice Lawyers, For Leave To Participate In Oral Argument (the “Motion to Participate”). In the Motion to Participate, the Florida Private Practice Amici requested that, in the event the Court held oral argument, it also grant them leave to participate in such oral argument. The Motion to Participate sought five minutes of argument time for the Florida Private Practice Amici.

3. On December 20, 2019, the Court issued an Order (the “Oral Argument Order”) granting oral argument in this matter, scheduling such argument for March 4, 2020, and allotting each side fifteen minutes for argument.

4. Because the Court’s Oral Argument Order does not expressly rule upon the Motion to Participate, the Florida Private Practice Amici now renew their previously filed Motion to Participate through this motion (the “Renewed Motion to Participate”) and again ask for leave to participate in argument.

5. The Amicus Brief filed by the Florida Private Practice Amici 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”), although it provides different bases for that conclusion. The Bar is unwilling to split its oral argument time with the Florida Private Practice Amici.

6. The Florida Private Practice Amici respectfully request that they be permitted to participate in oral argument for the following reasons:

7. This case has been designated as “high profile” and its outcome is likely to have a significant impact on consumers of Florida legal services, on practicing Florida lawyers, and on the Florida legal system more generally.

8. The Florida Private Practice Amici are Florida lawyers who are very much “in the trenches,” representing clients and practicing law in Florida state courts every day. They understand the impact of TIKD’s business model on Florida legal consumers and on their own practices.

9. One of the Florida Private Practice Amici (*i.e.*, The Ticket Clinic) has been a direct competitor of TIKD, and one of The Ticket Clinic’s attorneys (Ted Hollander) filed the first UPL complaint against TIKD by a private practice attorney in Florida.

10. In addition to competing with TIKD, the Ticket Clinic and Mr. Hollander have litigated against TIKD in several matters, both in Florida state and federal court, and thereby have significant real-world experience with TIKD’s practices.

11. The amicus brief filed by the Florida Private Practice lawyers raises a series of practical and important concerns about TIKD’s business model not raised in The Florida Bar’s Objection To The Report Of Referee (the “Objection”).

12. For instance, the Objection accepted at face value TIKD's own description of its business model rather than challenging it through evidence, and also proffered a more or less academic analysis of the UPL issues raised by TIKD's business. By contrast, the amicus brief addressed numerous tangible problems with TIKD's business model, including citing to evidence of actual consumer injury. The Florida Private Practice Amici are in the best position to address these real-world issues at oral argument.

13. Because of this background, and because of the substantial public interest in this case, participation by the Florida Private Practice Amici will enhance the range and depth of oral argument and therefore will be beneficial to the Court.

14. Finally, the Florida Private Practice Amici request only five (5) minutes of oral argument time, which they believe to be sufficient to address key matters raised in their amicus brief, but concise enough so as not to lengthen unnecessarily the hearing in this matter.

15. 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 Renewed Motion.

WHEREFORE, the Florida Private Practice Amici respectfully request that the Court grant them the opportunity to participate in oral argument.

Dated: December 16, 2019.

Respectfully submitted,

THOMAS & LOCICERO PL

*s/ James J. McGuire*

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been filed on this 16th day of December, 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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*s/ James J. McGuire*  
\_\_\_\_\_  
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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.


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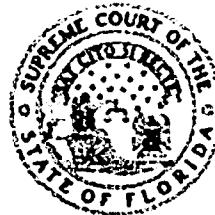
Appellant(s)

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



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Served:

D. KENT SAFRIET  
MOHAMMAD OMAR JAZIL  
THOMAS ROY PHILPOT  
DAVID B. KING  
JOHN STEWART MILLS  
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ANGELINA M. PEREZ  
JESSE LUKE GREEN

**EXHIBIT A**



CASE NO.: SC14-1200

Page Two

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