

IN THE SUPREME COURT OF FLORIDA  
(Before a Referee)

THE FLORIDA BAR,  
  
Petitioner,

Supreme Court Case  
No. 18-149

v.

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

TIKD SERVICES LLC,  
A Foreign Limited Liability Company,

and

CHRISTOPHER RILEY,  
individually and as Founder of  
TIKD SERVICES LLC,

Respondents.

\_\_\_\_\_ /

**THE FLORIDA BAR'S MOTION TO STRIKE ERWIN ROSENBERG'S  
SUBSTANTIVE MOTIONS, NOTICES, AND  
REQUEST FOR JUDICIAL NOTICE**

The Florida Bar, pursuant to Rules of Appellate Procedure 9.300, 9.225, 9.370, and 9.440, hereby moves to strike Erwin Rosenberg's substantive motions, notices, and request for judicial notice, and states as follows:

1. On January 10, 2020, Erwin Rosenberg filed a Motion for Leave to File Amicus Brief in Support of Respondents. To date, this Court has not granted

RECEIVED, 02/03/2020 04:11:34 PM, Clerk, Supreme Court

Mr. Rosenberg's Motion and The Florida Bar is not asking the Court to strike the motion.<sup>1</sup>

2. Since filing the Motion for Leave to File Amicus Brief in Support of Respondents and without leave of this Court, Erwin Rosenberg has engaged in conduct which presumes he is authorized to fully participate in these proceedings.

3. Erwin Rosenberg is not a party to these proceedings.

4. Erwin Rosenberg admits he is a disbarred lawyer and is not licensed to practice law in Florida. Therefore, he is not permitted to practice law or appear before this Court to represent another.

5. Erwin Rosenberg is licensed in another state, and as a foreign attorney, he did not seek permission to appear in these proceedings. *See Fla. R. App. P. 9.440(a)*.

6. Erwin Rosenberg is a pro se individual seeking leave to file an amicus brief, and as such may only file a brief and only with leave of court. *See Fla. R. App. P. 9.370*.

7. On January 28, 2020, Mr. Rosenberg filed a Notice of Supplemental Authority.

---

<sup>1</sup> The Florida Bar has taken no position on whether the Court should grant leave to Erwin Rosenberg to file an amicus brief, but notes that, under Fla. R. App. P. 9.370(a), Mr. Rosenberg's burden is to demonstrate to this Court how he "can assist the court in the disposition of th[is] case," not to reargue his own disbarment.

8. On January 29, 2020, Mr. Rosenberg filed a second Notice of Supplemental Authority and a substantive motion.

9. On January 31, 2020, Mr. Rosenberg filed a second substantive motion.

10. On February 3, 2020, Mr. Rosenberg filed a request for Judicial Notice.

11. Pursuant to Fla. R. App. P. 9.225, only parties may file Notices of Supplemental Authority. Since Mr. Rosenberg is a stranger to these proceedings, the Notices of Supplemental Authority are unauthorized.

12. Nothing in the Florida Rules of Civil Procedure or the Florida Rules of Appellate Procedure permits Erwin Rosenberg to file substantive motions or a Request for Judicial Notice.

WHEREFORE, The Florida Bar, for the grounds stated above, respectfully requests this Court enter an order striking Erwin Rosenberg's January 28, 2020, January 29, 2020, January 31, 2020, and February 3, 2020 filings and grant such other relief as it may deem proper.

/s/ Algeisa Maria Vazquez  
Algeisa Maria Vazquez  
Florida Bar No. 899968  
The Florida Bar  
Ft. Lauderdale Branch Office  
1300 Concord Terrace, Suite 130  
Sunrise, Florida 33323

(954) 835-0233, ext. 4148

Primary E-Mail: [avazquez@floridabar.org](mailto:avazquez@floridabar.org)

Secondary E-Mail: [upl@floridabar.org](mailto:upl@floridabar.org)

**CERTIFICATE OF SERVICE**

I hereby certify that this Motion to Strike has been filed via the statewide e-portal and true and correct copies were forwarded by e-service to:

Christopher Michael Kise, Co-Counsel for Respondents

Primary E-mail: [ckise@foley.com](mailto:ckise@foley.com)

Joshua M. Hawkes, Co-Counsel for Respondents

Primary E-mail: [jhawkes@foley.com](mailto:jhawkes@foley.com)

Ramon A. Abadin, Co-Counsel for Respondents

Primary E-mail: [rabadin@abadinlaw.com](mailto:rabadin@abadinlaw.com)

Secondary E-mail: [icastellon@abadinlaw.com](mailto:icastellon@abadinlaw.com)

James J. McGuire, Counsel for Amicus Curiae Florida Private Practice Lawyers

Primary E-mail: [jmguire@tlolawfirm.com](mailto:jmguire@tlolawfirm.com)

Secondary E-mail: [tgilley@tlolawfirm.com](mailto:tgilley@tlolawfirm.com)

Secondary E-mail: [nparsons@tlolawfirm.com](mailto:nparsons@tlolawfirm.com)

Gregg D. Thomas, Counsel for Amicus Curiae Florida Private Practice Lawyers

Primary E-mail: [gthomas@tlolawfirm.com](mailto:gthomas@tlolawfirm.com)

Secondary E-mail: [dlake@tlolawfirm.com](mailto:dlake@tlolawfirm.com)

Secondary E-mail: [nparsons@tlolawfirm.com](mailto:nparsons@tlolawfirm.com)

Raoul G. Cantero, Counsel for Amici Curiae Responsive Law and Center for Public Interest Law

Primary E-mail: [raoul.cantero@whitecase.com](mailto:raoul.cantero@whitecase.com)

Erwin Rosenberg, nonparty

Primary E-mail: [erwinrosenberg@gmail.com](mailto:erwinrosenberg@gmail.com)

Secondary E-mail: [erwinrosenberg@icloud.com](mailto:erwinrosenberg@icloud.com)

Chris W. Altenbernd, Co-Counsel for Petitioner

Primary E-mail: [service-caltenbernd@bankerlopez.com](mailto:service-caltenbernd@bankerlopez.com)

Secondary E-mail: [caltenbernd@bankerlopez.com](mailto:caltenbernd@bankerlopez.com)

William A. Spillias, UPL Counsel  
Primary E-mail: [wspillias@floridabar.org](mailto:wspillias@floridabar.org)

This 3rd day of February 2020.

/s/ Algeisa Maria Vazquez  
Algeisa Maria Vazquez  
Florida Bar No. 899968  
Bar Counsel