

IN THE SUPREME COURT OF FLORIDA
(Before a Referee)

THE FLORIDA BAR,

Petitioner,

v.

TIKD SERVICES LLC,
A Foreign Limited Liability Company,

and

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

Respondents.

Supreme Court Case
No. SC18-149

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

REPLY BRIEF OF THE FLORIDA BAR

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SYMBOLS AND REFERENCES

The Florida Bar shall be referred to as “The Florida Bar” or “the Bar.”

TIKD SERVICES LLC shall be referred to as “TIKD.”

Christopher Riley and TIKD SERVICES LLC together shall be referred to as “Respondents.”

Respondents’ customers shall be referred to as “TIKD customers.”

Florida licensed lawyers representing TIKD customers shall be referred to as “TIKD lawyers.”

Respondent Christopher Riley’s Affidavit shall be referred to as “Riley Aff.” followed by the referenced paragraph (Riley Aff. ¶ ____).

Respondent Christopher Riley’s sworn statement before the Eleventh Judicial Circuit Unlicensed Practice of Law Committee “B” shall be referred to as “Riley Stmt.” followed by the referenced page and line numbers (Riley Stmt. ____: ____ - ____).

Exhibit 3A to The Florida Bar’s Motion for Summary Judgment shall be referred to as “TIKD website” followed by the referenced page number(s) (TIKD website p. ____).

Respondents’ Terms of Service shall be referred to as “TOS” followed by the referenced page number(s) (TOS p. ____).

The Report of Referee shall be referred to as “ROR” followed by the referenced page number(s) (ROR p. ____).

The Services Agreement between Respondents and TIKD lawyers shall be referred to as “TIKD Services Agreement” followed by the referenced paragraph number(s) (TIKD Services Agreement ¶ ____) or exhibit letter (TIKD Services Agreement Exh. ____).

ARGUMENT

I. **RESPONDENTS' CONDUCT CONSTITUTES THE PRACTICE OF LAW AND, BECAUSE IT IS NOT AUTHORIZED, IS THE UNLICENSED PRACTICE OF LAW**

In determining whether conduct is the practice of law, this Court's focus is the character of the services rendered and acts performed rather than the nature of the forum where the services are performed. *The Florida Bar v. Moses*, 380 So. 2d 412, 415 (Fla. 1980). As held by this Court:

The best test, it seems to us, is what is done, not where, for the safest measure is the character of the acts themselves. If they constitute the practice of law the fact that they are done in the private office of the one who performs them or before a nonjudicial body in no way changes their character.

State ex rel. The Florida Bar v. Sperry, 140 So. 2d 587, 591 (Fla. 1962), *judgment vacated on other grounds*, 373 U.S. 379 (1963).

The forum where Respondents offer to provide legal services is a mobile app. Respondents argue because their services are offered via a mobile app, they are merely deploying “technology to facilitate the resolution of a traffic citation” and not engaging in the practice of law. Respondents’ Response to Petitioner’s Objection to the Report of the Referee (“Resp. Br.”) p. 8. This argument ignores the fundamental focus of the analysis – the character of the services rendered and the acts performed.

Applying this focus and this Court's precedent to the record evidence, it is clear Respondents are engaging in the practice of law by offering to provide legal representation including hiring Florida lawyers to provide legal services to Respondents' customers. *The Florida Bar v. We The People Forms and Service Center of Sarasota, Inc.*, 883 So. 2d 1280, 1281-83 (Fla. 2004); *The Florida Bar v. Consolidated Business and Legal Forms, Inc.*, 386 So. 2d 797 (Fla. 1980). That the services are provided through a mobile app does not change the character of the service or authorize Respondents to engage in the practice of law.

A. Respondents Are Engaging in the Practice of Law

The basis of the Referee's ruling is that because licensed Florida lawyers go to court to represent Respondents' customers, Respondents are not practicing law and therefore cannot be engaging in the unlicensed practice of law. ROR p. 12. This finding is contrary to the case law and ignores the facts before the Referee. A nonlawyer who offers to provide legal services to the public and provides the legal services through a member of The Florida Bar hired by the nonlawyer is engaging in the practice of law. *We The People*, 883 So. 2d at 1282-83; *Consolidated*, 386 So. 2d at 799-801.

While Respondents may disclose TIKD is not a law firm, its advertising is an offer to provide legal services. TIKD website pp. 1-22. It is undisputed the

core purpose of Respondents' nonlawyer business is to offer the public a way to resolve a legal problem: traffic tickets. Respondents admit TIKD offers "a . . . means to resolve the issues presented by a traffic citation." Resp. Br. p. 5. The service TIKD offers and provides is legal representation and TIKD's business model would not exist without the lawyers. Respondents make the legal representation attractive by repackaging it using technology, offering the ticketed driver the legal service for 80% of the cost of the ticket, and agreeing to pay fines and court costs.

From the point of view of the customers, they are purchasing legal representation from TIKD. TIKD is the merchant. The point of sale is TIKD and the product it sells is a lawyer who goes to court to defend the traffic ticket. Using the website or a mobile app, TIKD customers purchase legal representation from TIKD and by doing so, TIKD customers rely on TIKD to help resolve their legal problem. Respondents are engaging in the unlicensed practice of law by causing customers to rely on Respondents to help them resolve their traffic ticket in court. *The Florida Bar v. Brumbaugh*, 355 So. 2d 1186, 1193-94 (Fla. 1978).

Although the respondents in *We The People* were offering the same type of services offered by TIKD – legal representation by a member of The Florida Bar – Respondents attempt to avoid this clear holding by arguing the lawyers are not

hired or controlled by TIKD. Resp. Br. pp. 13-14; 14 n. 9. The Referee finds this as well in concluding Respondents are not engaging in the practice of law. ROR pp. 7-8, 12. Respondents' assertion and the Referee's finding is contrary to TIKD's Terms of Service which defines the services TIKD offers and provides their customers:

3. Provision of Services. The TIKD Properties provide a service made available by Company designed to help users challenge their traffic violation tickets by *hiring* independent attorneys *on users' behalf* to represent users in challenging traffic violation tickets (the "Services").

TOS p. 2 (emphasis added).

Despite Respondents' assertion TIKD does not hire or retain any lawyers, TIKD's Terms of Service explains after TIKD receives payment it will hire a TIKD lawyer. TOS p. 4. Since Respondents cannot appear in court, TIKD contracts with the Florida lawyers it assigns to its customers and appears to designate when the lawyer-client relationship is established.¹ TIKD's Terms of Service states, "After TIKD retains the attorney your [sic] behalf, an attorney-client relationship is established between you and the independent attorney." *Id.* After hiring the lawyer for the customer, TIKD remains involved in the transaction by reserving the right to furnish the customer with confirmation that

¹ The parties stipulated to the Referee admitting under seal the TIKD Services Agreements between TIKD and TIKD lawyers who represent TIKD customers.

a request for a court hearing has been filed, a court date has been set, a case has been decided, and any fees or costs associated with the case have been fully paid and/or the case has been closed with the court. TOS p. 4.

It is Respondents, not the lawyer, who accept or decline a customer's request for services "on a case-by-case basis." Riley Aff. ¶ 5; TOS p. 2. If Respondents decline the ticket, Respondents notify their customer and the customer pays nothing. Riley Aff. ¶ 6. If Respondents accept the ticket, TIKD charges the customer 80% of the ticket, hires the lawyer to defend the customer's ticket in court, and pays the lawyer "a flat fee per ticket defended." Riley Aff. ¶ 18; Riley Stmt. 14:4-14. TIKD initiates the lawyer-client relationship, hires and assigns the lawyer, and pays the legal fees. Riley Aff. ¶¶ 7, 11-12, 18; Riley Stmt. 14:4-17, 64:17-25; TOS p. 4. TIKD pays a portion of the customer's payment to the lawyer once the case is concluded.² The record shows TIKD communicates with TIKD customers while the customer is represented by a TIKD lawyer. TOS p. 4. Notably, TIKD lawyers are contractually obligated to communicate with TIKD regarding each ticket defended.³

² TIKD Services Agreement, ¶¶ 2.1, 2.2; Exhibits B, "Fee Schedule," TIKD Bates numbered pp. 50, 59, 68, 76, 85, 93.

³ TIKD Services Agreement, Exhibit A, "TIKD Guidelines."

If the TIKD customer does not want the lawyer TIKD has chosen for them, the customer has a one-day right to a full refund after which the customer “will not be able to cancel the transaction and . . . will not be able to get a refund under any circumstances.” TOS p. 3. If a TIKD customer is dissatisfied with any of TIKD’s services, including the lawyer or the legal services provided, TIKD requires their customer to submit to arbitration.⁴ TOS p. 8. In sum, the customer purchases legal representation from TIKD, and TIKD offers, sells, and controls the transaction.

Like the nonlawyer entities in *We The People* and *Consolidated*, Respondents sell legal services, use Florida lawyers to provide those legal services to their customers, set the fees, and control other aspects of a lawyer-client relationship. In *Consolidated*, this Court grappled with the issue of lay control of the lawyers and found unlicensed practice of law would still exist even if the corporate respondent corrected its conduct. This Court found respondents had no other means of producing income other than by providing legal services and stated, “[t]he nature of the corporate business is such that it must be deemed to be engaged in the unauthorized practice of law with or without the examples of lay

⁴ Rule 4-5.1(i) of the Rules Regulating The Florida Bar specifically permits a member of the Bar to require arbitration for fee disputes only. As Respondents are not lawyers or a law firm, Respondents are not bound by this rule or any of the Rules of Professional Conduct. Therefore, TIKD is able to circumvent this rule and require arbitration regarding the quality of the services provided by the lawyer.

control” *Consolidated*, 386 So. 2d at 799. The same is true with Respondents’ business.

Throughout this litigation, Respondents argue this Court’s precedent as cited by the Bar is not applicable. Respondents seem to argue because the case law is not on all fours with the facts of this case, it cannot be used as a basis to enjoin Respondents from engaging in the unlicensed practice of law. The Referee agrees with Respondents. If this Court’s opinions regarding the unlicensed practice of law could only be used when the facts exactly match the conduct at issue, this Court would never be able to refine the definition of the unlicensed practice of law or apply it to facts and circumstances which did not exist at the time of these decisions. The businesses in *We The People* and *Consolidated* existed in brick and mortar buildings. Respondents’ business exists on the internet. When this Court decided the cases cited by the Bar, the internet was a thing of science fiction and mobile apps were far from a possibility or reality. That today’s technology did not then exist does not diminish the central holding of those cases and the cases which followed: a nonlawyer or nonlawyer entity who offers to provide or provides legal services, even if provided by a member of The Florida Bar, is engaging in the unlicensed practice of law. If the Referee had correctly applied the law to the facts, she would have found TIKD is engaging in the unlicensed practice of law.

B. Respondents' Conduct Is Not Authorized

When examining whether conduct is the unlicensed practice of law, whether the conduct is authorized must be determined. *Moses*, 380 So. 2d at 416. Relying on Rules 4-1.8 and 4-5.4 of the Rules Regulating The Florida Bar, the Referee found Respondents are not practicing law because their business merely makes third party payments to Florida lawyers. ROR p. 12. The implication of this finding is that these rules authorize Respondents' conduct. Since Rules 4-1.8 and 4-5.4 address lawyer conduct, the Referee's use and interpretation of the rules is incorrect.

In finding Respondents' activity was not the practice of law, the Referee cited Rule 4-1.8(f) and found TIKD is permitted to pay a lawyer on behalf of a customer if the customer consents. *Id.* Contrary to the finding of the Referee, consent is not the only factor and does not authorize Respondents' activities. Rule 4-1.8(f) prohibits a lawyer from accepting fees from a third party for representing a client unless the client gives informed consent, the third party does not interfere with the lawyer's independence of professional judgment, and the client's confidential information is protected.⁵ The rule governs the conduct of the lawyer,

⁵ Respondents' Terms of Service states, "neither receipt of any services in connection with the TIKD Properties, nor any e-mail or other communication sent through the TIKD Properties . . . will be treated as confidential." TOS p. 1.

not the conduct of a nonlawyer or third party, and does not authorize the practice of law by a nonlawyer or a nonlawyer business.

Similarly, Rule 4-5.4(d) cited by the Referee addresses lawyer conduct only. Rule 4-5.4(d) prohibits a lawyer from permitting “a person who recommends, employs, or pays the lawyer to render legal services for another to direct or regulate the lawyer’s professional judgment in rendering such legal services.” R. Regulating Fla. Bar 4-5.4(d). The Referee relies on the “or pays” language of the rule to find the Respondents did not engage in the practice of law. Again, this reading is too narrow and does not address Respondents’ other activities, but appears to stretch the rule to fit the Referee’s factual finding that TIKD lawyers are independent and therefore TIKD cannot be found to be engaging in the practice of law.

If this Court were to agree with the Referee’s interpretation and application of the case law and Rules 4-1.8 and 4-5.4, any nonlawyer or nonlawyer entity would be authorized to market and provide professional legal services to the public with little or no oversight by this Court. The Referee’s reliance on rules regulating lawyer conduct to implicitly authorize the practice of law by nonlawyer Respondents is misguided and warrants reversal as clearly erroneous.

C. **The Court Should Not Authorize Respondents' Activities**

Although this Court has the jurisdiction to authorize activity previously held to constitute the unlicensed practice of law, this Court should not depart from long-standing precedent and authorize Respondents' activities. In their response brief, Respondents cite to articles in *The Florida Bar Journal* advocating increased access to justice with and without utilizing technology. Amici Responsive Law and Center for Public Interest Law ("Amici") cite to American Bar Association reports and other articles. Amici urge this Court to "join the emerging trend and acknowledge that new business models can provide greater access to legal services for those who have been previously unable to obtain such services." Brief of Amici Curiae Responsive Law and Center for Public Interest Law ("Amici Responsive Law and CPIL Br.") p. 3. The crux of these arguments is access to justice would be limited and utilization of new technologies would be stifled if TIKD's business model is found to be the practice of law. This argument is a classic red herring meant to divert this Court's attention from the sole issue before the Court: whether Respondents are engaging in the unlicensed practice of law.⁶

⁶ Another red herring raised by Respondents and Amici is the implication The Florida Bar is violating the antitrust laws by bringing this prosecution. As noted by Amici, the antitrust dispute brought by TIKD against The Florida Bar was resolved in favor of the Bar. See Amici Responsive Law and CPIL Br. p. 13. Respondents cannot use this prosecution to take another bite at this apple.

Nevertheless, The Florida Bar agrees the issues raised by Respondents and Amici relating to access to justice and technology are important and “the rules can be adapted to increase access to legal services without sacrificing ethics.” Amici Responsive Law and CPIL Br. p. 14. These issues are under review and study by the Bar and the Florida Commission on Access to Civil Justice. *In Re: Florida Commission on Access to Civil Justice*, Administrative Order No. AOSC18-27 (2018). If this Court wants further review and study to determine what rules can and should be adapted, this Court may order a study of the use of technology to increase access to justice and may set the parameters of the study. This unlicensed practice of law prosecution is not the place to adapt the rules and allow an activity that is not authorized.

II. THE COURT HAS SUFFICIENT EVIDENCE TO FIND PUBLIC HARM AND ENJOIN RESPONDENTS FROM ENGAGING IN THE UNLICENSED PRACTICE OF LAW

Respondents assert The Florida Bar lacks the evidence to prove a *prima facie* case of the unlicensed practice of law because the Bar did not provide evidence Respondents harmed consumers in any way. This argument ignores the facts and case law which clearly establish Respondents are engaging in the unlicensed practice of law. It also misconstrues this Court’s holdings regarding public harm.

As held by this Court:

The reason for prohibiting the practice of law by those who have not been examined and found qualified to practice is frequently misunderstood. It is not done to aid or protect the members of the legal profession It is done to protect the public from being advised and represented in legal matters by unqualified persons over whom the judicial department can exercise little, if any, control in the matter of infractions of the code of conduct which, in the public interest, lawyers are bound to observe.

It cannot be denied that the public suffers, as does both the public image of the legal profession and our judicial system, when those not qualified to do so are permitted to hold themselves out as qualified to practice law and as worthy of the trust and confidence of those who have legal problems the solution of which require trained advice and counsel.

Sperry, 140 So. 2d at 595.

This Court protects the public from harm by maintaining “strict standards of competence and ethical responsibility to be reached prior to admission to practice law in Florida,” requiring persons admitted to the practice of law “continue to adhere to these standards or suffer the disciplinary powers residing in this Court,” outlining the type of nonlawyer activity which constitutes the unlicensed practice of law, and enjoining the offending activity. *Moses*, 380 So. 2d at 417.

Respondents and the Referee appear to believe because the individual who ultimately appears in court to represent Respondents’ customers is a member of The Florida Bar, there is no harm and no unlicensed practice of law. However,

because Respondents offer to provide legal representation and remain involved in the legal services delivered by lawyers, this Court is unable to ensure the ethical rules put in place by this Court which lawyers are bound to observe are being followed. While lawyers are prohibited from advertising in a misleading way, Respondents are not. Rule 4-7.13. While lawyers are prohibited from paying fines for their clients, Respondents are not. Rule 4-1.8(e). While lawyers are prohibited from splitting a fee with a nonlawyer, Respondents are not. Rule 4-5.4(a). While lawyers are only specifically permitted to require arbitration in fee disputes, Respondents require it in all disputes, including malpractice by the lawyer. Rule 4-1.5(i). Because Respondents' conduct is not subject to the Rules of Professional Conduct, the public is not being protected.

Even if this Court were to find The Florida Bar has not shown the public is being harmed, this Court may still enjoin Respondents' activity as the unlicensed practice of law. The respondent in *Sperry* was providing patent services in Florida. In establishing the test for the practice of law and the rationale for prohibiting the unlicensed practice of law, this Court noted, “[i]n fairness to the respondent . . . we make clear that nothing we have said in this opinion is intended to indicate that he is not in fact competent to perform those services which he has rendered or that the affairs of any citizen of this state have suffered at his hands.” *Sperry*, 140 So. 2d at

595. Nevertheless, the potential for harm was present and this Court found the respondent was engaging in the unlicensed practice of law.⁷ For the same reasons, harm and the potential for harm are present here. To protect the public, Respondents should be enjoined.

III. THE FLORIDA BAR DOES NOT DISPUTE THE FACTS IN THE RECORD AND OBJECTS ONLY TO THE REFEREE'S INTERPRETATION OF THE FACTS AND APPLICATION OF THE LAW

Respondents assert the Bar “failed to introduce any evidence that establishes UPL” and is now attempting to contravene the undisputed record. Resp. Br. p. 19. This argument misconstrues the Bar’s objection to the Referee’s report. The Bar is not contravening the undisputed record. Rather, the Bar objects to and disputes the inferences made by the Referee which formed the basis of her finding that Respondents are not engaging in the practice of law and therefore cannot be found to be engaging in the unlicensed practice of law.

The most fundamental inferences made by the Referee are that TIKD lawyers are independent and TIKD only provides administrative and financial services to ticketed drivers. Respondents and the Bar presented the same evidence. The dispute is not about the facts themselves; it is about the Referee’s

⁷ *State ex rel. The Florida Bar v. Sperry*, 140 So. 2d 587, 591 (Fla. 1962), judgment vacated on other grounds, 373 U.S. 379 (1963) was reversed on federal preemption grounds which are not applicable herein.

interpretation of the facts and her application of the law to the facts. Had the Referee correctly applied the law to the facts, without making these inferences, she may not have reached her conclusions and ruled contrary to this Court's precedent.

Although this Court should find Respondents are engaging in the unlicensed practice of law based on the record, to the extent this Court believes there are any material facts in dispute, this Court should remand this proceeding to a referee for further development of the facts.

CONCLUSION

Technology is reshaping the legal profession and this transformation should be studied so any change to the rules regulating the practice of law upholds protection of the public and the core values of the profession. This case is not the proper place to make this change. By deviating from long-standing precedent, the Referee found Respondents' conduct permissible and redefined the practice of law.

The Florida Bar respectfully requests this Court overturn the Referee's report, find Respondents are engaging in the unlicensed practice of law, and enjoin Respondents Christopher Riley and TIKD Services LLC from continuing to do so.

Respectfully submitted,

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This 15th day of August 2019.

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CERTIFICATE OF COMPLIANCE

I HEREBY CERTIFY that the text herein is printed in Times New Roman, 14-point font, in compliance with Fla. R. App. P. 9.210.

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