

IN THE SUPREME COURT OF FLORIDA

Case No. SC18-67

CITIZENS FOR STRONG SCHOOLS, INC.;
et al.,

Plaintiffs/Appellants,

L.T. No. 1D16-2862

vs.

FLORIDA STATE BOARD OF EDUCATION;
et al.,

Defendants/Appellees,

and

CELESTE JOHNSON; et al.,

Intervenors/Defendants/Appellees.

**VERIFIED MOTION FOR ADMISSION TO APPEAR PRO HAC VICE
PURSUANT TO FLORIDA RULE OF APPELLATE PROCEDURE 9.440(a)
AND FLORIDA RULE OF JUDICIAL ADMINISTRATION 2.510**

Comes now Timothy D. Keller, Movant herein, and respectfully represents
the following:

1. Movant resides in Chandler, AZ. Movant is not a resident of the State of Florida.
2. Movant is an attorney with the Institute for Justice, with offices located at 398 S. Mill Avenue, Suite 301, Tempe, AZ 85281; Tel: (480) 557-8300.

RECEIVED, 01/26/2018 04:38:29 PM, Clerk, Supreme Court

3. Movant has been retained as a member of the above-named law firm on August 14, 2014 by Celeste Johnson, Kenia Palacios, Deaundrice Kitchen, Margot Logan, Karen Tolbert, and Marian Klinger to provide legal representation in connection with the above-styled matter now pending before the above-named court of the State of Florida.

4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdictions:

| COURT | ADMITTED | ASSIGNED NUMBER | STATUS NOTES |
|----------------------------------------------------|------------------|------------------------|---------------------|
| U.S. Supreme Court | March 24, 2003 | N/A | Active |
| U.S. Court of Appeals – 9 th Circuit | April 20, 2005 | 019844 | Active |
| U.S. District Court of AZ | June 16, 2003 | N/A | Active |
| Arizona Bar | October 25, 1999 | 019844 | Active |

5. There are no disciplinary proceedings pending against Movant.

6. Within the past five (5) years, Movant has not been subject to any disciplinary proceedings.

7. Movant has never been subject to any suspension proceedings.

8. Movant has never been subject to any disbarment proceedings.

9. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant’s office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

10. Movant is not an inactive member of The Florida Bar.

11. Movant is not now a member of The Florida Bar.

12. Movant is not a suspended member of The Florida Bar.

13. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation from The Florida Bar.

14. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of Judicial Administration 2.510.

15. Movant has filed a motion to appear as counsel in Florida state courts during the past five (5) years in the following matter:

| DATE OF MOTION | CASE NAME | CASE NUMBER | MOTION GRANTED |
|-----------------------|----------------------------------------------------------------------------------------|--------------------|-----------------------|
| July 5, 2016 | <i>Citizens for Strong Schools, et al. v. Florida State Board of Education, et al.</i> | 1D16-2862 | July 22, 2016 |
| Aug. 28, 2014 | <i>Citizens for Strong Schools, et al. v. Florida State Board of Education, et al.</i> | 09-CA-4534 | Sept. 14, 2014 |

16. Local counsel of record associated with Movant in this matter is Ari S. Bargil, FL Bar No. 71454, who is an active member in good standing of The Florida Bar and has offices at Institute for Justice, 2 S. Biscayne Boulevard, Suite 3180, Miami, FL 33131, Tel: (305) 721-1600.

17. Movant has read the applicable provisions of Florida Rule of Appellate Procedure 9.440(a), Florida Rule of Judicial Administration 2.510, and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

18. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.

DATED this 17th day of January 2018.

Timothy D. Keller
398 S. Mill Avenue, Suite 301
Tempe, AZ 85281

STATE OF ARIZONA
COUNTY OF MARICOPA

I, Timothy D. Keller, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief.



Timothy D. Keller

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Appellate Procedure 9.440(a) and Florida Rule of Judicial Administration 2.510.

DATED this 26th day of January 2018.

INSTITUTE FOR JUSTICE

By: /s/ Ari S. Bargil
Ari S. Bargil (FL Bar No. 71454)
INSTITUTE FOR JUSTICE
2 S. Biscayne Boulevard, Suite 3180
Miami, FL 33131
Tel: (305) 721-1600
Fax: (305) 721-1601
Email: abargil@ij.org

Counsel for Intervenors/Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of January 2018, a true and correct copy of the foregoing *Verified Motion for Admission to Appear Pro Hac Vice Pursuant to Florida Rule of Appellate Procedure 9.440(a) and Florida Rule of Judicial Administration 2.510* was filed with the Clerk of the court and also furnished by U.S. mail to PHV Admissions, The Florida Bar, accompanied by payment of the \$250.00 filing fee made payable to The Florida Bar and sent to the following counsel of record:

Jonathan A. Glogau,
Chief, Complex Litigation
OFFICE OF THE ATTORNEY GENERAL
PL-01, The Capitol
Tallahassee, FL 32399-0400
Jon.Glogau@myfloridalegal.com
crystal.harwood@myfloridalegal.com

Jodi Siegel
Kirsten Anderson
SOUTHERN LEGAL COUNSEL, INC.
1229 NW 12th Avenue
Gainesville, FL 32601
Jodi.Siegel@southernlegal.org
Kirsten.Anderson@southernlegal.org
Lennette.Daniels@southernlegal.org

Rocco E. Testani
Stacey McGavin Mohr
Lee A. Peifer
EVERSHEDS SUTHERLAND (US) LLP
999 Peachtree St. Northeast, Suite 2300
Atlanta, Georgia 30309-4416
roccotestani@eversheds-sutherland.com
staceymohr@eversheds-sutherland.com
leepeifer@eversheds-sutherland.com

Neil Chonin
2436 N.W. 27th Place
Gainesville, FL 32601
neil@millerworks.net

Timothy McLendon
3324 West University Avenue, Box 215
Gainesville, FL 32607
tedmcl@msn.com

Deborah Cupples
2841 SE 13th Street, G-327
Gainesville, FL 32608
cupplesd@gmail.com

Eric J. Lindstrom
EGAN, LEV & SIWICA, P.A.
P.O. Box 5276
Gainesville, FL 32627-5276
elindstrom@eganlev.com

Sarah R. Sullivan
ssullivan@fcsl.edu
DISABILITY AND PUBLIC BENEFITS
CLINIC, FLORIDA COASTAL SCHOOL OF LAW
8787 Baypine Road, Suite 255
Jacksonville, Florida 32256

Judy Bone, General Counsel
Mari Presley, Assistant General Counsel
Matthew Mears
FLORIDA DEPARTMENT OF EDUCATION
1244 Turlington Building
325 W. Gaines Street
Tallahassee, FL 32399
Judy.Bone@fldoe.org
Mari.Presley@fldoe.org
Matthew.Mears@fldoe.org
Cara.Martin@fldoe.org

Dena H. Sokolow
Renee Meenach Decker
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC
SunTrust Center
200 South Orange Avenue
P.O. Box 1549
Orlando, FL 32802-1549
dsokolow@bakerdonelson.com
redecker@bakerdonelson.com
OLS-eService@bakerdonelson.com

Kele Stewart
UNIVERSITY OF MIAMI SCHOOL OF LAW
Children and Youth Clinic
1311 Miller Drive, Suite F 305
Coral Gables, FL 33146
kstewart@law.miami.edu

Dawn K. Roberts
General Counsel
FLORIDA SENATE
302 The Capitol
404 S. Monroe Street
Tallahassee, FL 32399-1100
roberts.dawn@flsenate.gov
dkroberts.seminole@gmail.com

Robert M. Brochin
Clay M. Carlton
MORGAN, LEWIS & BOCKIUS LLP
200 South Biscayne Blvd., Suite 5300
Miami, Florida 33131
bobby.brochin@morganlewis.com
clay.carlton@morganlewis.com

Adam S. Tanenbaum
General Counsel
FLORIDA HOUSE OF REPRESENTATIVES
418 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399-1300
adam.tanenbaum@myfloridahouse.gov
debi.robbs@myfloridahouse.gov

/s/ Ari S. Bargil
Ari S. Bargil (FL Bar No. 71454)
INSTITUTE FOR JUSTICE