

IN THE FLORIDA SUPREME COURT

CASE NO.: SC19-1394

CITIZENS PROPERTY
INSURANCE CORPORATION,

Petitioner,

v.

MANOR HOUSE LLC, OCEAN VIEW
LLC, MERRITT LLC,

Respondents.

_____ /

**FLORIDA DEFENSE LAWYERS ASSOCIATION’S
MOTION FOR LEAVE TO APPEAR AS AMICUS CURIAE
IN SUPPORT OF CITIZENS PROPERTY INSURANCE CORPORATION**

Pursuant to Florida Rule of Appellate Procedure 9.370, the FLORIDA DEFENSE LAWYERS ASSOCIATION (“FDLA”) hereby moves this Honorable Court for leave to file an Amicus Brief in support of the Petitioner CITIZENS PROPERTY INSURANCE CORPORATION and in support states as follows:

1. FDLA is a statewide organization of civil defense attorneys consisting of approximately 1,000 members.

2. The FDLA maintains an active amicus curiae program in which members donate their time and skills to submit briefs in important cases pending in Florida state and federal appellate courts. These cases involve significant legal issues with statewide impact on tort and insurance matters and trial procedure.

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3. This case carries statewide importance as it addressed a certified question of great importance concerning whether a plaintiff can recover extra-contractual, consequential damages without filing a bad faith action under Florida Statute section 624.155. The FDLA is uniquely situated to provide this Court with input on the far-reaching impact that a decision will have on the legal and insurance industries as its members represent insurance carriers in these actions.

4. FDLA would like to address this issue and the corresponding policy considerations.

5. FDLA hereby gives notice of its intent to appear as amicus curiae in support of the position Petitioner Citizens Property Insurance Corporation.

6. FDLA hereby requests that it be permitted to file an amicus brief in support of the position of the Petitioner.

7. Derek Angell, Esq. of O'Conner & O'Conner, LLC will be drafting the amicus brief on behalf of the FDLA.

8. The undersigned has contacted counsels for all parties. The undersigned is authorized to represent that the parties do not have any objections to FDLA's appearance as an amicus curiae.

WHEREFORE, FLORIDA DEFENSE LAWYERS ASSOCIATION hereby requests that this Court enter an order permitting it to appear as amicus curiae and to file an amicus brief in this matter.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via E-PORTAL on 10th day of October, 2019, to all counsel listed on the attached service list.

BOYD & JENERETTE, P.A.
As Chair of the Amicus Curiae
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/s/ Kansas R. Gooden

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