

IN THE SUPREME COURT OF FLORIDA

CASE NO. SC19-1798

THE CITY OF CORAL GABLES, FLORIDA,

Petitioners,

v.

FLORIDA RETAIL FEDERATION, INC., SUPER PROGRESO, INC., and THE
STATE OF FLORIDA,

Respondent.

On Appeal from the Third District Court of Appeal of the State of Florida
Case No. 3D17-0562

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Surfrider Foundation, Florida Council of Churches, Greenpeace, Legal Scholars, Florida Wildlife Federation, Save the Manatee Club, and Center for Biological Diversity (Amici), pursuant to Rule 9.370(d), Florida Rules of Appellate Procedure, respectfully provide notice of their intent to seek leave to file an amici curiae brief in support of Petitioner, the City of Coral Gables, should this Court accept jurisdiction in this case. The Amici are committed to protecting local governments' ability to respond to issues of environmental concern impacting their communities and represent diverse groups that will be impacted by the Court's decision. As such, the Amici have an interest in the issue of the validity and interpretation of sections 500.90, 403.708(9), and 403.7033, Fla. Stats., to the extent the statutes' provisions are argued to preempt local governments from regulating harmful plastics that wreak havoc on their communities, environment, and economy. Additionally, the Amici have considerable experience and unique expertise regarding the broad ramifications of this case in the legal, policy, and environmental context and will respectfully offer this expertise to the Court if it accepts jurisdiction of this case. Particularly, Amici will assist the Court by explaining what the Florida Constitution has expressly afforded local governments with home rule authority, the legislative limits in preempting this authority, and the impacts of this case on the proposed Amici and the general public.

Respectfully submitted on this 23rd day of October, 2019.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was served by e-mail this 23rd day of October, 2019, on:

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