

IN THE SUPREME COURT OF FLORIDA

UNITED INSURANCE COMPANY OF
AMERICA, ET AL.,

Petitioners,

v.

JIMMY PATRONIS, ET AL.,

Respondents.

Case No. SC20-1306

**STATE OF FLORIDA'S MOTION FOR LEAVE
TO FILE AN AMICUS BRIEF IN SUPPORT OF RESPONDENTS**

Pursuant to Florida Rule of Appellate Procedure 9.370, the State of Florida moves for leave to file a brief as amicus curiae in support of Respondents.

1. In 2016, Florida passed a new law, which aimed to require that life insurers treat their policyholders' beneficiaries fairly by, among other things, periodically checking a database to determine whether a policyholder had died, entitling a beneficiary to benefits. To ensure that all policyholders, not just future ones, were protected, the law applied to both existing and future policies.

2. Petitioners, a group of life insurance providers, argue that Respondents cannot apply the new law to their old policies.

3. In the decision below, the First District Court of Appeal correctly rejected that claim.

4. The State has an interest in defending the constitutionality of its laws.

5. Undersigned counsel is authorized to represent that counsel for the parties do not oppose this motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished by electronic service through the Florida Courts E-Filing Portal on August 19, 2021 to all counsel of record.

/s/ Evan Ezray
Deputy Solicitor General