



March 1, 2021

Florida Supreme Court
Office of the Clerk
500 South Duval Street
Tallahassee, FL 32399-1927

In re: *Amendments to Florida Rule of Civil Procedure 1.510*, Case No. SC20-1490

Dear Justices:

Armellini Express Lines, Inc. supports the summary judgment change to Rule 1.510 that this Honorable Court is making effective May 1, 2021.

Armellini Express Lines believes that the federal summary judgment standard articulated by the U.S. Supreme Court in *Celotex Corp. v. Catrett*, 477 U.S. 317 (1986); *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242 (1986); and *Matsushita Elec. Indus. Co. v. Zenith Radio Corp.*, 475 U.S. 574 (1986) (together the "Celotex trilogy") is more practical, fair and efficient to all parties and the Courts where the evidence is not in dispute.

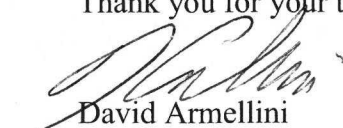
By allowing evidence to be presented digitally during and after the discovery process, the Court's resources can be better utilized in cases that cannot be adjudicated through summary judgment where issues of material fact remain.

All Armellini Express Line tractors have front facing cameras installed on our equipment as well as other valuable safety recording equipment that saves many different types of information on what the truck was doing thirty seconds before an event. This allows unequivocal and uncontroverted data of how accidents have occurred and are more accurate than witness accounts.

Therefore, Armellini Express Lines believes a more effective, less restrictive summary judgment standard, which does not by default send most cases to trial, will help Florida's court system which is already backlogged with jury trials as a result of the COVID-19 pandemic.

A significant number of jury trials in both civil and criminal cases have been postponed as a consequence of the pandemic, and even now it is unclear when jury trials will fully resume. When some normalcy returns, courts will undoubtedly have a hard time to catch up, particularly in criminal trials. The federal summary judgment standard will help ensure only truly material factual disputes in civil cases require lengthy, costly civil trials, allowing courts to better manage their dockets.

Thank you for your time and consideration.


David Armellini
President Armellini Express Lines Inc.