

IN THE SUPREME COURT OF FLORIDA

STEVEN J. PINCUS, an individual, on behalf
of himself and all others similarly situated,

Florida Supreme Court
Case No. SC21-159

Appellant,

v.

Eleventh Circuit
Case No. 19-10474

AMERICAN TRAFFIC SOLUTIONS, INC.,
a Kansas corporation,

Appellee.

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**APPELLANT STEVEN J. PINCUS'S
REQUEST FOR ORAL ARGUMENT**

Pursuant to Rule 9.320 of the Florida Rules of Appellate Procedure, Appellant STEVEN J. PINCUS requests oral argument on this matter. Appellant respectfully submits that oral argument will enhance the Supreme Court's consideration of the issues raised in the Eleventh Circuit's certified questions. This case involves novel issues of Florida law, including questions of statutory interpretation, interplay between statutes, authority of local governments, unjust enrichment claims, and more. As the Eleventh Circuit noted, this case "may affect millions of Floridians and dozens of Florida's municipal traffic enforcement regimes." *Pincus v. American Traffic Solutions, Inc.*, 986 F.3d 1305, 1320 (11th Cir. 2021). "Resolution of the common law issues may also reverberate throughout Florida, affecting Florida's unjust enrichment law across diverse contexts." *Id.*

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Given the importance and complexity of these issues, Appellant submits that the Court would benefit from oral argument, where the parties can answer any questions and discuss any issues not sufficiently covered in the briefing. Further, counsel for Appellant has conferred with counsel for Appellee, and Appellee has indicated that it does not oppose this request. According, Appellant respectfully requests that the Court grant oral argument.

Dated this 22nd day of July, 2021.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this Motion has been E-filed using the E-filing Portal and that a copy has been sent via email to the following parties this 22nd day of July, 2021: Kevin P. McCoy (kmccoy@carltonfields.com), Joseph H. Lang (jlang@carltonfields.com), David R. Wright (DWright@carltonfields.com), and David M. Costello (david.costello@myfloridalegal.com).

By: /s/ Bret L. Lusskin, Esq.
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