

IN THE SUPREME COURT OF FLORIDA
(Before a Referee)

THE FLORIDA BAR,
Complainant,

v.

NAH-DEH E W SIMMONS,
Respondent.

Supreme Court Case
No. SC-

The Florida Bar File
No. 2021-00,208(4D), 2021-
00,443(4D), 2021-00,460(4D).

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MOTION TO CONSOLIDATE

COMES NOW, The Florida Bar, by and through its undersigned counsel, and moves the Court to Consolidate Florida Bar File Nos. 2021-00,208,(4D), 2021-00,443(4D), and 2021-00460(4D) with pending Florida Supreme Court Case No. SC21-21 and further states as follows:

1. Florida Supreme Court Case No. SC21-21 is currently pending before a referee in the Seventh Circuit in and for Volusia County, Florida.
2. 3. The Report of Referee in SC21-21 is due on or before February 18, 2022.
4. On November 12, 2021, a duly constituted grievance committee of the Fourth Circuit found probable cause for further disciplinary proceedings in all three Florida Bar File Numbers cited above.

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5. Contemporaneous to the filing of this Motion to Consolidate is Notice of Related Cases and another Complaint in Florida Bar File Nos. 2021-00,208(4D), 2021-00,443(4D), and 2021-00,460(4D). A Florida Supreme Court Case number has not yet been assigned to these new cases.

6. The allegations in all eight Florida Bar File Numbers identified above are substantially similar and, pursuant to judicial economy, should be tried together.

WHEREFORE, The Florida Bar prays this Honorable Court will consolidate all three Florida Bar File Numbers cited above into SC21-21 for purposes of resolution of trial at one time.

Respectfully submitted,

A handwritten signature in black ink that reads "James K. Fisher". The signature is written in a cursive, slightly slanted style.

James Keith Fisher, Bar Counsel
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CERTIFICATE OF SERVICE

I certify that this document has been e-filed with The Honorable John A. Tomasino, Clerk of the Supreme Court of Florida, with a copy via email to respondent's Counsel Edward Iturralde, 2910 Kerry Forest Pkwy, D4204, Tallahassee, FL 32309-6892 ed@iturraldelaw.com, respondent's counsel, and via email to Staff Counsel, The Florida Bar, 651 E. Jefferson Street, Tallahassee, FL 32399-2300 at psavitz@floridabar.org, on this 29th day of December, 2021.

A handwritten signature in cursive script that reads "James K. Fisher". The signature is written in black ink and is positioned above the printed name.

James Keith Fisher, Bar Counsel