

**IN THE SUPREME COURT OF FLORIDA**

CASE NO.: SC21-917

Lower Tribunal Nos.: 1D19-2819; 372018CA001509XXXXXX;  
372018CA000882XXXXXX; 372018CA000699XXXXXX

NICOLE "NIKKI" FRIED, ETC.

Petitioner(s),

v.

STATE OF FLORIDA, ET AL.

Respondent(s).

---

**VERIFIED MOTION OF MICHAEL A. CARDOZO FOR  
ADMISSION TO APPEAR PRO HAC VICE PURSUANT TO  
FLORIDA RULE OF JUDICIAL ADMINISTRATION 2.510**

COMES NOW, Michael A. Cardozo, Movant herein, and respectfully  
represents the following:

1. Movant is not a resident of the State of Florida.
2. Movant is an attorney and member of the law firm of Proskauer  
Rose LLP, with offices at: Eleven Times Square, New York, N.Y. 10036,  
(212) 969-3230.
3. Movant has been retained as a member of the above named law  
firm to represent Dan Daley,<sup>1</sup> Frank C. Ortiz, Rebecca A. Tooley, Justin

---

<sup>1</sup> The instant action was originally commenced by Commissioner Daley  
(and others) in his official capacity as Commissioner of the City of Coral  
Springs, Florida, but, during the pendency of this proceeding,  
Commissioner Daley no longer holds that office and, thus, his successor is

RECEIVED, 06/22/2021 10:46:31 AM, Clerk, Supreme Court

Flippen, City of Coral Springs, City of Pembroke Pines, City of Coconut Creek and City of Wilton Manors in the underlying proceeding and Movant now seeks to be admitted in this proceeding through the duration of the appeal.

4. Since 1966, Movant has been and presently is a member in good standing of the bar of the highest court of the State of New York, where Movant regularly practices law, and where his registration number is 1080050.

5. Movant is an active member in good standing and currently eligible to practice law in the following jurisdictions:

<b>JURISDICTION</b>	<b>ADMISSION DATE</b>
STATE OF NEW YORK	1966
U.S. COURT OF APPEALS, SECOND CIRCUIT	1967
U.S. DISTRICT COURT, NEW YORK, SOUTHERN DISTRICT	1968
U.S. DISTRICT COURT, NEW YORK, EASTERN DISTRICT	1969
U.S. COURT OF APPEALS, NINTH CIRCUIT	1971
SUPREME COURT OF THE UNITED STATES	1972
U.S. COURT OF APPEALS, THIRD CIRCUIT	1978
U.S. COURT OF APPEALS, FIFTH CIRCUIT	1986
U.S. COURT OF APPEALS, FEDERAL CIRCUIT	1993
U.S. COURT OF APPEALS, ELEVENTH CIRCUIT	2001
U.S. COURT OF APPEALS, FIRST CIRCUIT	2001

---

substituted in by operation of law pursuant to Florida Rule of Appellate Procedure 9.360(c)(2).

6. There have been no disciplinary, suspension, disbarment, or contempt proceedings initiated against Movant in the preceding 5 years.

7. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

8. Movant is not an inactive member of the Florida Bar.

9. Movant is not now a member of the Florida Bar.

10. Movant is not a suspended member of the Florida Bar.

11. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation or disciplinary revocation from The Florida Bar.

12. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of Judicial Administration 2.510.

13. Movant has filed two motions to appear as counsel in Florida state courts during the past five (5) years, to wit: the lower court proceedings in this action, in which Movant's motions were granted.<sup>2</sup>

---

<sup>2</sup> Contemporaneously, Movant is seeking admission in a related Florida Supreme Court Case, *City of Weston, Florida, et al. v. State of Florida, et al.*, Case No. SC21-918.

14. Local counsel of record associated with Movant in this matter is:
- a. **Name:** Matthew Triggs
  - b. **Florida Bar No.:** 0865745
  - c. **Law Firm:** Proskauer Rose LLP
  - d. **Address:** 2255 Glades Road, Suite 421-A, Boca Raton, FL 33431
  - e. **Email:** mtriggs@proskauer.com
  - f. **Telephone:** (561) 241-7400
  - g. **Fax:** (561) 241-7145

15. Movant has read the applicable provisions of Florida Rule of Judicial Administration 2.510 and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

16. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.

Dated: June 22, 2021

*s/ Michael A. Cardozo*  
Michael A. Cardozo, Esq.  
PROSKAUER ROSE LLP  
Eleven Times Square  
New York, New York 10036-8299  
Telephone: (212) 969-3230  
Facsimile: (212) 969-2900  
Primary e-mail:  
mcardozo@proskauer.com

STATE OF NEW YORK

COUNTY OF NEW YORK

I, Michael A. Cardozo, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief.

s/ Michael A. Cardozo  
Movant

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Judicial Administration 2.510.

Dated: June 22, 2021.

s/ Matthew Triggs

Matthew Triggs  
Florida Bar No. 0865745  
PROSKAUER ROSE LLP  
2255 Glades Road, Suite 421-A  
Boca Raton, Florida 33431  
Telephone: (561) 241-7400  
Facsimile: (561) 241-7145  
Primary e-mail: mtriggs@proskauer.com  
Secondary e-mail:  
florida.litigation@proskauer.com

*Counsel for Appellees Dan Daley, Frank C. Ortis, Rebecca A. Tooley, Justin Flippen, City of Coral Springs, City of Pembroke Pines, City of Coconut Creek and City of Wilton Manors*

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 22, 2021, a true and correct copy of the foregoing motion will be served by mail to PHV Admissions, The Florida Bar, 651 East Jefferson Street, Tallahassee, Florida 32399-2333, accompanied by payment of the \$250.00 filing fee made payable to The Florida Bar; and by electronic service through the Florida Courts E-Filing Portal upon all counsel of record.

*s/ Matthew Triggs*

---

Matthew Triggs