

IN THE SUPREME COURT OF FLORIDA

PLANNED PARENTHOOD OF
SOUTHWEST AND CENTRAL
FLORIDA, *et al.*,

Petitioners,

v.

STATE OF FLORIDA, *et al.*,

Respondents.

Case No. SC22-1127

L.T. Nos. 1D22-2034

37 2022 CA 000912

RECEIVED, 08/26/2022 07:12:21 PM, Clerk, Supreme Court

**VERIFIED MOTION FOR ADMISSION TO APPEAR *PRO HAC VICE*
PURSUANT TO FLORIDA RULE OF GENERAL PRACTICE AND
JUDICIAL ADMINISTRATION 2.510**

Comes now Johanna Zacarias,
Movant herein, and respectfully represents the following:

1. Movant resides in Warwick, New York
(City) (State)

Movant is not a resident of the State of Florida.

Movant is a resident of the State of Florida and has an application pending admission to The Florida Bar and has not previously been denied admission to the The Florida Bar.

2. Movant is an attorney and a member of the law firm of (or practices law under the name of) American Civil Liberties Union Foundation, with offices at

125 Broad Street, 18th Floor, New York,

(Street Address)

(City)

New York, NY, 10004, (212)-549-2633
(County) (State) (Zip Code) (Telephone)

3. Movant has been retained personally or as a member of the above-named law firm on May 24, 2022, by Gainesville Woman Care, LLC (d/b/a Bread & Roses Women’s Health Center), Indian Rocks Woman’s Health Center, Inc. (d/b/a Bread & Roses), St. Petersburg Woman’s Health Center, Inc., and Tampa Woman’s Health Center, Inc. to provide legal representation in connection with the above-styled matter now pending before the above-named Court of the State of Florida.

4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdiction(s): Include attorney or bar number (s). (Attach an additional sheet if necessary.)

| <u>Jurisdiction</u> | <u>Attorney/Bar Number</u> |
|---|----------------------------|
| New York State | 5919618 |
| U.S. Court of Appeals for the 2nd Circuit | N/A |

5. A judicial officer or the entity responsible for attorney regulation has neither initiated disciplinary, suspension,

disbarment, or contempt proceedings or disciplined, suspended, disbarred or held Movant in contempt in the preceding 5 years, except as provided below (give jurisdiction of proceeding, date upon which proceeding was initiated, nature of alleged violation, statement of whether the proceeding has concluded or is still pending, and sanction, if any, imposed): (Attach an additional sheet if necessary.)

N/A

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

7. Movant is not an inactive member of The Florida Bar.

8. Movant is not now and has never been a member of The Florida Bar.

9. Movant is not a suspended member of The Florida Bar.

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

11. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of General Practice and Judicial Administration 2.510, except as provided below (give date of disciplinary action or contempt, reasons therefor, and court imposing contempt): (Attach an additional sheet if necessary.)

N/A

12. Movant has filed motion(s) to appear as counsel in Florida state courts during the past five (5) years in the following matters: (Attach an additional sheet if necessary.)

| Date of Mot. | Case Name | Case No. | Court | Date Granted/Denied |
|--------------|---|----------------------|---|---------------------|
| 6/2/2022 | <i>Planned Parenthood of Southwest and Central Florida, et al., v. State of Florida, et al.</i> | Case No. 2022 CA 912 | Circuit Court of the Second Judicial Circuit, Leon County | 6/14/2022 Granted; |
| 7/11/2022 | <i>State of Florida, et al., v. Planned Parenthood of Southwest and Central Florida, et al.</i> | Case No. 1D22-2034 | First District Court of Appeal | 7/13/2022 Granted; |
| 8/15/2022 | <i>Planned Parenthood of Southwest and Central Florida, et al., v. State of Florida, et al.</i> | Case No. SC22-1050 | The Supreme Court of Florida | 8/16/2022 Granted |

13. Local counsel of record associated with Movant in this matter is

Benjamin Stevenson (FL Bar #598909) who is an active member in good standing of The Florida Bar and has offices at 3 W. Garden St., Suite 712,

(Street Address)

Pensacola, Escambia, Florida, 32502
(City) (County) (State) (Zip Code)

(708) 363-2738

(Telephone with area code)

(If local counsel is not an active member of The Florida Bar in good standing, please provide information as to local counsel's membership status. N/A)

14. 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.

15. 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.

16. **Certificate of Consultation.** Respondents/State do not oppose this relief.

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

DATED this 26th day of August, 2022.

/s/ Johanna Zacarias
Johanna Zacarias
125 Broad Street, 18th Fl.
New York, NY 1004
T. 212.549.2633
jzacarias@aclu.org

STATE OF New York

COUNTY OF Orange

I, Johanna Zacarias, 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 personal belief.

/s/ Johanna Zacarias
Johanna Zacarias

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

DATED this 26th day of August, 2022

s/ Benjamin James Stevenson
Local Counsel of Record
Benjamin James Stevenson
(FL Bar #598909)
American Civil Liberties Union
of Florida
3 W. Garden St., Suite 712

Pensacola, FL 32502-5636
(786) 363-2738
bstevenson@aclufl.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing motion was served electronically to PHV Admissions, The Florida Bar, and to all counsel of record on the E-filed date of this document by filing the document with service through the e-Service system (Fla. R. Jud. Admin. 2.516(b)(1)), and that the movant has paid the fees described in the Rules of Regulation the Florida Bar concerning non-Florida lawyers appearances in a Florida court or has notified The Florida Bar of movant's request for a judicial waiver of said fees.

DATED this 26th day of August, 2022.

s/ Whitney White
Whitney White
American Civil Liberties Union
Foundation
125 Broad Street, 18th Floor
New York, NY 10004
(212)-549-2633
wwhite@aclu.org