

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

KELVIN LEON JONES, *et al.*,

Plaintiffs,

v.

Case No. 4:19-cv-300-RH/MJF

RON DeSANTIS, *et al.*,

Defendants.

**GOVERNOR AND SECRETARY OF STATE’S
OMNIBUS MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Defendants Governor Ron DeSantis and Secretary of State Laurel M. Lee (“State Defendants”) move for summary judgment on all Plaintiffs’ claims in these consolidated cases. In support, State Defendants rely upon their memorandum of law filed in support of this motion and the exhibits attached thereto. In short, Plaintiffs lack Article III standing and there is no genuine issue of material fact on any of Plaintiffs’ claims. Consequently, State Defendants are entitled to judgment as a matter of law in State Defendants’ favor on each of Plaintiffs’ claims.

Respectfully submitted by:

JOSEPH W. JACQUOT
(FBN 189715)
General Counsel
joe.jacquot@eog.myflorida.com
NICHOLAS A. PRIMROSE
(FBN 104804)
Deputy General Counsel
nicholas.primrose@eog.myflorida.com
JOSHUA E. PRATT (FBN 119346)
Assistant General Counsel
joshua.pratt@eog.myflorida.com
Executive Office of the Governor
400 S. Monroe St., PL-5
Tallahassee, FL 32399
Telephone: (850) 717-9310
Fax: (850) 488-9810

Counsel for Governor Ron DeSantis

GEORGE N. MEROS, JR.
(FBN 263321)
george.meros@hklaw.com
TARA R. PRICE (FBN 98073)
tara.price@hklaw.com
Holland & Knight LLP
315 South Calhoun Street, Suite 600
Tallahassee, Florida 32301
Telephone: (850) 224-7000
Facsimile: (850) 224-8832

BRADLEY R. MCVAY (FBN 79034)
General Counsel
brad.mcvay@dos.myflorida.com
ASHLEY E. DAVIS (FBN 48032)
Deputy General Counsel
ashley.davis@dos.myflorida.com
Florida Department Of State
R.A. Gray Building Suite, 100
500 South Bronough Street
Tallahassee, Florida 32399-0250
Phone: (850) 245-6536
Fax: (850) 245-6127

/s/ Edward M. Wenger

MOHAMMAD O. JAZIL
(FBN 72556)
mjazil@hgslaw.com
GARY V. PERKO (FBN 855898)
gperko@hgslaw.com
EDWARD M. WENGER
(FBN 85568)
ewenger@hgslaw.com
Hopping Green & Sams, P.A.
119 South Monroe Street, Suite 300
Tallahassee, Florida 32301
Phone: (850) 222-7500
Fax: (850) 224-8551

*Counsel for Florida Secretary of State
Laurel M. Lee*

CERTIFICATE OF COMPLIANCE WITH LOCAL RULES

The undersigned certifies that the foregoing complies with the size, font, and formatting requirements of Local Rule 5.1(C), and that the foregoing complies with the word limit. Specifically, this motion contains 96 words, excluding the case style, signature block, and certificates.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served to all counsel of record via email on this 18th day of February, 2020.

/s/ Edward M. Wenger
Attorney