

IN THE SUPREME COURT
OF THE STATE OF FLORIDA

CASE NO. SC00-2431

ALBERT GORE, Jr., Nominee of the Democratic Party of the
United States for President of the United States, and
JOSEPH I. LIEBERMAN, Nominee of the Democratic
Party of the United States for Vice President of the United States,

Appellants,

vs.

KATHERINE HARRIS, as SECRETARY OF STATE
STATE OF FLORIDA, and SECRETARY OF AGRICULTURE
BOB CRAWFORD, SECRETARY OF STATE KATHERINE HARRIS
AND L. CLAYTON ROBERTS, DIRECTOR, DIVISION OF
ELECTIONS,
individually and as members of and as THE FLORIDA ELECTIONS
CANVASSING COMMISSION,

and

THE MIAMI-DADE COUNTY CANVASSING BOARD,
LAWRENCE D. KING, MYRIAM LEHR and DAVID C. LEAHY
as members of and as THE MIAMI-DADE COUNTY CANVASSING
BOARD, and DAVID C. LEAHY, individually and as Supervisor of
Elections,

and

THE NASSAU COUNTY CANVASSING BOARD, ROBERT E.
WILLIAMS,
SHIRLEY N. KING, AND DAVID HOWARD (or, in the alternative,
MARIANNE P. MARSHALL), as members of and as the
NASSAU COUNTY CANVASSING BOARD,

and SHIRLEY N. KING, individually and as Supervisor of Elections,

and

THE PALM BEACH COUNTY CANVASSING BOARD,
THERESA LEPORE, CHARLES E. BURTON AND
CAROL ROBERTS, as members of and as the PALM BEACH COUNTY
CANVASSING BOARD, and THERESA LEPORE, individually
and as Supervisor of Elections,

and

GEORGE W. BUSH, Nominee of the Republican
Party of the United States for President of the United
States and RICHARD CHENEY, Nominee of the
Republican Party of the United States for
Vice President of the United States,

Appellees,

CASE NO.

ALBERT GORE, Jr., Nominee of the Democratic Party of the
United States for President of the United States, and
JOSEPH I. LIEBERMAN, Nominee of the Democratic
Party of the United States for Vice President of the United States,

Petitioners,

vs.

KATHERINE HARRIS, as SECRETARY OF STATE
STATE OF FLORIDA, and SECRETARY OF AGRICULTURE
BOB CRAWFORD, SECRETARY OF STATE KATHERINE HARRIS
AND L. CLAYTON ROBERTS, DIRECTOR, DIVISION OF
ELECTIONS,
individually and as members of and as THE FLORIDA ELECTIONS
CANVASSING COMMISSION,

Respondents.

MOTION OF APPELLANTS/PETITIONERS TO EXPAND INITIAL
BRIEF

The Appellants/Petitioners move, pursuant to Florida Rules of Appellate Procedure 9.210(a)(5) and 9.300, to expand the length of the Initial Brief to 65 pages.

The issues in this case are many and complex. The outcome of this case will likely determine who is the next President of the United States. The parties disagree vehemently on a multitude of issues. Each issue must be briefed.

The briefing schedule in this matter has been compressed because of the need for quick resolution recognized by all parties and the Court. The parties are filing briefs simultaneously at noon, December 6, 2000, and are not filing Reply Briefs. In an ordinary case Florida Rule of Appellate Procedure 9.210(a) would permit Appellants/Petitioners to file an Initial Brief of 50 pages and a Reply Brief of 15 pages, totaling 65 pages.

Appellants/Petitioners have made every effort to condense the Initial Brief. Granting the requested relief would serve the ends of justice. Appellants/Petitioners would not object to Appellees/Respondents receiving authority to file an expanded Initial Brief.

Respectfully submitted this ____ day of December 2000.

John D. C. Newton, II
Florida Bar No.: 0244538
Berger Davis & Singerman
215 South Monroe Street, Suite 705
Tallahassee, Florida 32301
Telephone: 850/561-3010
Facsimile: 850/561-3013

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by United States mail, hand delivery or facsimile

transmission this _____ day of December 2000 to the following

Barry Richard
Greenberg Traurig
101 East College Avenue
Tallahassee, FL 32301
for Governor Bush

R. Frank Myers
Messer Caparello & Self
215 South Monroe Street, Suite 701
Tallahassee, Florida 32301
for Intervenor Named West Florida Voters

Deborah Kearney, General Counsel
Florida Department of State
400 South Monroe Street, PL 02
Tallahassee, FL 32399
for Secretary Katherine Harris and
the Elections Canvassing Committee

Donna E. Blanton
Joseph Klock
Steel Hector & Davis
215 South Monroe Street, Suite 601
Tallahassee, FL 32301-1804
for Secretary Katherine Harris and
the Elections Canvassing Committee

Tucker Ronzetti
Assistant County Attorney
111 N.W. 1st Street
Miami, FL 33130
for Miami-Dade County Canvassing Board

Ben Ginsburg

State Republican Headquarters
420 West Jefferson Street
Tallahassee, FL 32301
for the Republican Party

Craig Meyer
Florida Department of Agriculture and Consumer Services
The Capitol
Tallahassee, FL 32399

Andrew McMahon
Palm Beach County Attorney Office
301 N Olive Avenue, Suite 601
West Palm Beach, FL 33401-4705
for Palm Beach Canvassing Board

Bruce Rogow
Bruce S. Rogow, P.A.
500 East Broward Boulevard, Suite 1930
Ft. Lauderdale, Florida 33394
for Palm Beach Canvassing Board

Michael S. Mullin
191 Nassau Place
Yulee, Florida 32097
for Nassau County Canvassing Board

Terrell C. Madigan
McFarlain Wiley Cassedy & Jones
215 South Monroe Street, Suite 600
Tallahassee, FL 32301-1804
for Intervenor Butler

John D. C. Newton, II
Attorney