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October 11, 2007

Mr. Thomas D. Hall
Clerk, Supreme Court of Florida
500 South Duval Street
Tallahassee, FL 32399-1927

Re: *Strand vs. Escambia County*, Case No. SC06-1894

Dear Mr. Hall:

We represent Escambia County, the Appellee and movant of the Motion for Rehearing and Clarification in this bond validation proceeding, which is pending before the Court. The Court held oral argument on Escambia County's motion on October 9, 2007.

I am writing in response to the October 5, 2007 letter, which Frederick J. Springer electronically filed on October 8, 2007, indicating that his client would not object to the consolidation of *Strand v. Escambia County* with three cases, which are still in the briefing stage. Mr. Springer's firm represents the League of Cities, which is an amicus curiae, not a party, in this matter.

Please be advised that Escambia County opposes the consolidation of *Strand vs. Escambia County* with *City of Parker vs. State*, Case No. SC07-1400, and *Bay County vs. Town of Cedar Grove*, Case Nos. SC07-1572 and SC07-1574. Florida Rule of Appellate Procedure 9.330(c) provides that a timely motion for rehearing and/or clarification of a decision in proceedings for the validation of bonds "shall receive immediate consideration by the Court." Escambia County desires the immediate consideration, which the rule provides.

Kindly also note that neither Escambia County nor the appellant, Dr. Gregory Strand, notified the Court about similar pending cases. That was not an oversight. Neither party deems *Strand vs. Escambia County* to be similar to *City of Parker vs.*

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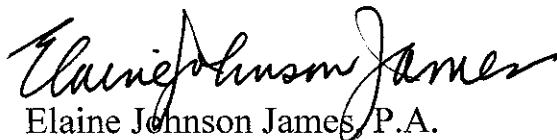
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State or Bay County vs. Town of Cedar Grove. Escambia County sees no nexus between *Miami Beach Redevelopment* and the facts presented in *Strand vs. Escambia County*. In his Initial Brief, Dr. Strand argued that *Miami Beach Redevelopment* was “inapposite” and “irrelevant” to the case at bar. Thus, the parties would appear to agree that there is no similarity between these cases and therefore no reason to consolidate *Strand vs. Escambia County* with *City of Parker vs. State* and *Bay County vs. Town of Cedar Grove*.

For the foregoing reasons, Escambia County respectfully requests that the Court render an immediate decision in accord with Florida Appellate Rule of Procedure 9.330(c). Thank you for your administration of this matter.

Respectfully,

EDWARDS ANGELL PALMER & DODGE LLP


Elaine Johnson James, P.A.

EJJ:ilr

cc: David S. Theriaque, counsel for appellant in *Strand*
Kerry Ann Schultz, counsel for appellant in *Strand*
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Frederick Springer, counsel for *amicus* in *Strand*