

1. As noted in the Certification Order of the Second District Court of Appeal, attached hereto as Exhibit A, the issues raised in this case are identical to those raised in *Telli v. Broward County*, Case No. SC11-1737.

2. In the interest of judicial economy, Appellants and Appellee respectfully suggest that this matter should be consolidated with Case No. SC11-1737.


3. Additionally, Appellants and Appellee seek an Order providing for an expedited briefing schedule. Appellants and Appellee are prepared to submit their brief within seven (7) days from the entry of an order granting the relief requested herein.

4. The undersigned counsel for Appellants has conferred with counsel of record for Appellants and Appellee in *Telli v. Broward County*, Case No. SC11-1737. Attorney Daniel Weinger, counsel for Appellant Telli, does not object to the relief requested as long as an expedited oral argument is requested. Attorney Burnadette Norris-Weeks, counsel for Appellee Snipes, and Attorney Andrew Myers, counsel for Broward County, Florida, take no position regarding the relief requested. Attorney Bruce Rogow, co-counsel for Appellant Telli, does not object to the relief requested.

WHEREFORE, Appellants and Appellee respectfully request that the Court enter an Order consolidating this case with Case No. SC11-1737 and issuing an expedited briefing schedule and oral argument.



ANDREA FLYNN MOGENSEN, Esquire
Attorney for Appellants
Florida Bar No. 0549681
Law Office of Andrea Flynn Mogensen, P.A.
200 S. Washington Blvd., Suite 7
Sarasota, FL 34236
Tel: (941) 955-1066
Fax: (941) 866-7323



David P. Persson, Esq.
Attorney for Appellee
Florida Bar No. 622486
Hankin, Persson, Davis, McClenathen & Darnell
1820 Ringling Blvd.
Sarasota, FL 34236-5917
(941) 365-4950 Telephone
(941) 365-3259 Facsimile

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 3, 2012, a copy of the foregoing has

been furnished via facsimile and Regular U.S. Mail to:

Frederick J. Elbrecht, Esq.
Co-Counsel for Sarasota County
1660 Ringling Blvd.
Sarasota, FL 34236
(941) 861-7272 Telephone
(941) 861-7267 Facsimile

Joni Armstrong Coffey, Esq.
Attorney for Respondents
Broward County Attorney
Government Center, Suite 423
115 South Andrews Avenue
Fort Lauderdale, FL 33301
(954) 357-7600 Telephone
(954) 357-7641 Facsimile

Andrew J. Myers, Esq.
Chief Appellate Counsel
Attorney for Respondents
Government Center, Suite 423
115 South Andrews Avenue
Fort Lauderdale, FL 33301
(954) 357-7600 Telephone
(954) 357-7641 Facsimile

Benjamin R. Salzillo, Esq.
Annika E. Ashton, Esq.
Attorney for Respondents
Government Center, Suite 423
115 South Andrews Avenue
Fort Lauderdale, FL 33301
(954) 357-7600 Telephone
(954) 357-7641 Facsimile

Burnadette Norris-Weeks, Esq.
Co-Counsel for Dr. Brenda C. Snipes
401 North Avenue of the Arts
Fort Lauderdale, Florida 33311
(954) 786-9770 Telephone
(954) 786-9790 Facsimile

William R. Scherer, Esq.
Daniel S. Weinger, Esq.
Eric J. Rayman, Esq.
Conrady & Scherer, LLP
Counsel for Mr. Telli
633 South Federal Highway
Fort Lauderdale, FL 33301
(954) 462-5500 Telephone
(954) 463-9244 Facsimile

Bruce S. Rogow, Esq.
Co-Counsel for Mr. Telli
500 E. Broward Blvd.
Suite 1930
Fort Lauderdale, FL 33394
(954) 767-8909 Telephone
(954) 764-1530 Facsimile

/s/ Andrea Flynn Mogensen
ANDREA FLYNN MOGENSEN, Esquire