

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

JULIE BAROODY, and
WILLIAM B. FARMER,

Plaintiffs,

v.

Case No.: 4:20-cv-217-AW-MAF

CITY OF QUINCY, FLORIDA,
KEITH A. DOWDELL, in his official
capacity as Commissioner and Mayor of the
City of Quincy, RONTE R. HARRIS, in his
official capacity as Commissioner and
Mayor Pro-Tem of the City of Quincy, and
ANGELA G. SAPP, in her official capacity
as Commissioner of the City of Quincy,

Defendants.

PLAINTIFFS' NOTICE OF CONSTITUTIONAL CHALLENGE

Plaintiffs, Julie Baroody and William B. Farmer, by and through the undersigned counsel, hereby gives notice of the Constitutional Challenge in compliance with Fed. R. Civ. P. 5.1 and N.D. Fla. Loc. R. 24.1 with respect to the constitutional challenge brought pursuant to the First, Fourteenth and Fifteen Amendments to the U.S. Constitution:

1. Whether the Redistricted Plan adopted by the City of Quincy and the Quincy City Commission, is unconstitutional, as raised in the Complaint for Injunctive and Declaratory Relief attached as **Exhibit 1**.

Respectfully submitted,

ANDREWS LAW FIRM

822 North Monroe Street

Tallahassee, Florida 32303

T: (850) 681-6416 / F: 681-6984

/s/ **Ryan J. Andrews**

RYAN J. ANDREWS (FBN 0104703)

ryan@andrewslaw.com

STEVEN R. ANDREWS (FBN 0263680)

steve@andrewslaw.com

DAVID A. WEISZ (*Pro Hac Vice Forthcoming*)

service@andrewslaw.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was served by electronic transmission, Certified Mail and/or hand delivery this 7th day of May, 2020, to:

City of Quincy, Florida
c/o Mayor Keith Dowdell
404 West Jefferson Street
Quincy, Florida 32351

Keith Dowdell, in his official capacity as Commissioner and Mayor of the City of Quincy
404 West Jefferson Street
Quincy, Florida 32351

Ronte R. Harris, in his official capacity as Commissioner and Mayor Pro-Tem of the City of Quincy
404 West Jefferson Street
Quincy, Florida 32351

Angela G. Sapp, in her official capacity as Commissioner of the City of
Quincy
404 West Jefferson Street
Quincy, Florida 32351

Ashley Moody, Florida Attorney General
Office of the Attorney General
State of Florida, The Capitol PL-01
Tallahassee, Florida 32399-1050
oag.civil.eserve@myfloridalegal.com

Jack Campbell, Esq.
State Attorney's Office
1A East Jefferson Street
Quincy, Florida 32351
SAO2_Gadsden@leoncountyfl.gov

Gary Roberts, City Attorney
404 West Jefferson Street
Quincy, Florida 32351
garyr@garyrobertslaw.com

/s/ **Ryan J. Andrews**
RYAN J. ANDREWS