

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

CONGRESSWOMAN CORRINE BROWN,

Plaintiff,

vs.

Case No.: 4:15-cv-00398-MW-CAS

**KEN DETZNER, in his official capacity as
Secretary of State of the State of Florida,
THE FLORIDA SENATE and THE
FLORIDA HOUSE OF REPRESENTATIVES,**

Defendants.

PLAINTIFF'S UNOPPOSED MOTION TO STAY THIS ACTION

Plaintiff, Congresswoman Corrine Brown, by and through undersigned counsel, hereby moves unopposed to stay this action. In support thereof, Plaintiff states as follows:

On July 9, 2015, the Florida Supreme Court invalidated Congressional District 5 as enacted by the Florida legislature in 2012. The Court held that Article III, §20 of the Florida Constitution requires Congressional District 5 to be drawn in an East-West configuration, rather than its traditional North-South configuration. Though the Florida Supreme Court invalidated District 5, the legislature has not enacted a remedial District 5, nor has any court imposed a redistricting plan that contains a remedial District 5. This case, therefore, should be stayed pending the imposition of a remedial district and all time limits for responding to Plaintiff's complaint (Doc. 1) and the Motion to Intervene filed by the League of Women Voters, et al. (Doc. 18) should be extended to 10 days after the Governor signs into law - or after the Court enters an Order that imposes - a remedial District 5.

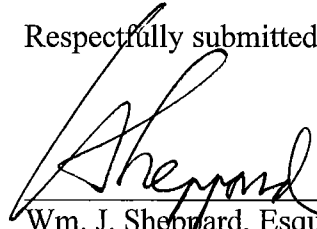
CERTIFICATION PURSUANT TO LOC. RULE 7.1(B)

Pursuant to N.D. Fla. Loc. R. 7.1(B), Plaintiff's counsel has conferred with opposing counsel in a good faith effort to resolve the issues raised in this motion. Defendants' counsel, including counsel for Defendant-Intervenors, advised that Defendants do not oppose this motion.

CONCLUSION

Based upon the foregoing, Plaintiff, Congresswoman Corrine Brown, respectfully requests that this Court enter its Order staying this action.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sheppard', is written over a horizontal line.

Wm. J. Sheppard, Esquire
Florida Bar No.: 109154
Elizabeth L. White, Esquire
Florida Bar No.: 314560
Bryan E. DeMaggio, Esquire
Florida Bar No.: 055712
Amanda J. Woods, Esquire
Florida Bar No.: 112296
Sheppard, White, Kachergus & DeMaggio, P.A.
215 Washington Street
Jacksonville, Florida 32202
Telephone: (904) 356-9661
Facsimile: (904) 356-9667
Email: sheplaw@att.net
COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 30, 2015, I electronically filed the foregoing with the Clerk of the Court by using CM/ECF System which will send a notice of electronic filing to the following:

**Adam S. Tanenbaum, Esquire
Assistant Attorney General
400 South Monroe Street
Suite PL-01, The Capitol
Tallahassee, Florida 32399**

**David A. Fugett, Esquire
The Fugett Law Firm
6706 N. 9th Avenue, Suite D6
Pensacola, Florida 32504**

**Jason N. Zakia, Esquire
Jesse L. Green, Esquire
Raoul G. Cantero, Esquire
Wachovia Financial Center
Suite 4900
200 South Biscayne Boulevard
Miami, Florida 33131**

**Andy V. Bardos, Esquire
Gray Robinson, P.A.
301 South Bronough Street, Suite 600
Tallahassee, Florida 32301**

**David B. King, Esquire
King Blackwell Zehnder, et al.
25 East Pine Street
Orlando, Florida 32801**

I HEREBY CERTIFY that on September 30, 2015, a true and correct copy of the foregoing document and the notice of electronic filing was sent by United States Mail to the following non-CM/ECF participants:

N/A



ATTORNEY

ldh[brown.corrine.motion.stay.motion]