

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

**CONGRESSWOMAN CORRINE BROWN,  
JOHNNY BROWN, THEODORE BROWN,  
MARY LAWSON BROWN, MARY L. GEORGE,  
CRYSTAL R. BROWN, JUSTIN CAMPBELL,  
CAS**

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

**FERRILL HILL, MARGIE KELLY CODY,  
JOSEPHINE HALL, SANDRA JACKSON,  
MAMIE JACKSON, WILFRED W. REDDICK,  
JR., SHANTEZ ROBINSON, CARRIE DAVIS,  
JEAN REDDICK, ALVIN SHEPARD, CURTIS  
WALKER, PHYLLIS JOHNSON, JEROME  
BROWN, JOANN M. BROWN, HAZEL D. GILLIS,  
ANTONIA G. BRYANT, EULIE B. JOHNSON,  
LAVONNE P. MITCHELL, DARRYL MACK,  
ANTHONY MACK, DORETHA MACK, CONSTANCE  
S. HALL, SHAKUR ALI, MICHAEL ASHLEY,  
LAWRENCE AVERBECK, ANITA BAILEY, LEON  
BERRIER, DANIEL L. COLE, JASMINE CROMWELL,  
TRICIA DUNLAP, LA' DAISHA EVANS, JAMES  
FREEMAN, RUSSELL T. GASKIN, CLARETHA S.  
HICKS, TEVIN HENDERSON, MITZI HUTCHINSON,  
ANGELIQUE MATTHEWS, ANNA MCLAUGHLIN,  
EDWIN MERRITT, LILLIE P. POWELL, TAURICE  
RICKS, DEVIN ROBERTS, CARY P. ROBINSON,  
ALEXANDRA SAFFICE, SHAKA SHABAZZ, FELICIA  
SMITH, RICHARD ALAN SPAULDING, WILLIE  
THOMAS, TEAONNDA THOMPSON, RODERIC  
TURNER, MARY S. ADAMS, JOY GREGORY, WILBERT  
GREGORY, CARLOTTA L. GUYTON, LUELLE  
MCQUEEN, DOROTHY M. OLIVER, JACOBY  
PITTMAN, BARON RIVERS, KIMBERLY RIVERS,  
ANMENIA SHAHAB, NEEMA YA NATHIERI,  
MELVIN A. PHILPOT, VELMA WILLIAMS,  
BEVERLYE COLSON NEAL, TYRONE FIELDS,  
GLORIA R. GREEN, MAXINE S. HIXON, REBECCA  
JOHNSON, NEVA SPANN-KIRKLAND, SUSIE L.  
JOHNSON HARRIS, EDDIE L. JAMES, BENTLEY  
M. CAREY, DWYCE L. ROSS, KENNETH WALKER,**

**TIFFANY WARE, VANESSA WILLIAMS, CHARITA FINCH,  
LAVENIA MAY, DR. ROLOUS A. FRAZIER, JR., DOROTHY  
FLUITT, SHEILA B. SMITH, CLARISE REDDICK, DAISY  
BALES, CONSTANCE BANGO, DELORIS R. SHEPHERD,  
VERNON MCQUEEN, HERBERT WILLIAMS JR.,  
ROD ZEIGLER, ROYCE FLAGLER, MABLE BUTLER,  
JEAN CAMPBELL, WILLIE CAMPBELL, ELLA MAE  
CAMPBELL, KALEIGH CAMPBELL, MIA CAMPBELL,  
WALTER DULES WILLIAMS, LULA COOKS WILLIAMS,  
ROBERTA WILLIAMS, DANIEL J. WILLIAMS, IDA M.  
CARSON, JUANITA SANDERS, CHERYLL DANIELS, EDDIE  
A. BENN, RICH SLEET, MARIA T. BARNES, ALLEN WIGGINS,  
HENRIETTA J. TICE, JASMINE MCKAY, LATOYA DAVIS,  
AND LULA DAVIS,**

**Plaintiffs,**

**vs.**

**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.**

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**PLAINTIFFS' PARTIALLY UNOPPOSED MOTION TO FILE FIRST AMENDED  
VERIFIED COMPLAINT**

Plaintiff, Congresswoman Corrine Brown, by and through undersigned counsel and pursuant to Fed.R.Civ.P. 15(a)(2) and N.D. Fla.Loc.R. 15.1, hereby moves this Honorable Court for leave to file an amended complaint in this cause and states as follows:

1. On August 12, 2015, Plaintiff filed her initial Verified Complaint. (Doc. 1).
2. On September 8, 2015, this case was stayed. (Doc. 26).

3. Due to subsequent events, Plaintiff now needs to amend her complaint. A copy of Plaintiffs' Partially Unopposed First Amended Verified Complaint is attached hereto as Exhibit A.

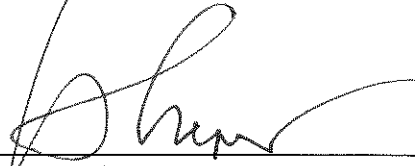
4. Opposing counsel for Defendants Senate, House and Defendant-Intervenors have indicated that they would not oppose Plaintiff amending her complaint. Opposing counsel for Defendant Secretary of State has indicated that he takes no position until he sees the Amended Complaint.

WHEREFORE, Plaintiff respectfully requests this Honorable Court grant Plaintiff leave to file Plaintiffs' First Amended Verified Complaint.

**MEMORANDUM OF LAW**

Federal Rule of Civil Procedure 15(a)(2) provides in pertinent part: "[A] party may amend its pleading only with the opposing party's written consent or the Court's leave. The Court should freely give leave when justice so requires." Accordingly, given there have been no previous amendments have filed, justice requires that the Court grant the instant motion for leave to file an amended complaint.

Respectfully submitted,



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COUNSEL FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 29<sup>th</sup>, 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  
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I HEREBY CERTIFY that on December 29<sup>th</sup>, 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.amend.complaint.motion]