

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

Roque “Rocky” De La Fuente Guerra,  
Victor Di Maio, Jose Ramon Bolano Valladares,  
Ada L. Hernandez, Marco A. Bolano Hernandez,  
Carlos H. Aleman Gonzalez, Sobeida Aleman, and  
Carlos Heriberto Aleman,

Plaintiffs,

CASE NO.: 4:16-cv-00026-RH-CAS

vs.

Democratic Party of Florida and  
Ken Detzner, Secretary of State of Florida,

Defendants.

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**MOTION TO ADVANCE CAUSE ON CALENDAR AND TO SCHEDULE ORAL  
ARGUMENT ON PLAINTIFFS’ MOTION FOR PRELIMINARY  
INJUNCTIVE RELIEF AND/OR MOTION FOR SUMMARY JUDGEMENT**

COMES NOW the Plaintiffs, by and through their undersigned attorney and files this their Motion to Advance Cause on Calendar and to Schedule Oral Argument on Motion for Preliminary Injunctive Relief and Partial Summary Judgment and says:

This case pertains to the legality of actions of the Florida Secretary of State and a state division of a major political party, acting under the authority of a state statute, to disallow participation of a candidate for President of the United States in the Florida Presidential Primary election scheduled for March 15, 2016.

The election in controversy is scheduled for March 15, 2016. If this court rules expeditiously, and the court finds that the Defendants' actions are impermissible under the United States Constitution, the Defendant, Secretary of State, will have sufficient time to add the name of the Plaintiff to the ballot for the March 15, 2016 presidential primary election.

Even if the Defendant, Secretary of State cannot add Plaintiff's name to the ballot in time for the March, 15, 2015 election, an expeditious decision will allow the election to be postponed and rescheduled in time for the results to determine the number of delegates each candidate will be awarded, prior to the Democratic National Convention

Wherefore, Plaintiff requests that this court schedule a hearing on Plaintiff's Motion for Preliminary Injunctive Relief and Motion for Summary Judgment expeditiously.

Plaintiff's attorney has not contacted the attorneys for the Florida Democratic Party nor to the Florida Attorney General because the attorneys who will be representing them are unknown at the time of filing this motion. A copy has been sent to the attorneys who have represented these Defendants in recent cases as a courtesy.

Respectfully Submitted,

s/ Michael A. Steinberg

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY I hereby certify that I have sent a copy of the foregoing to  
the following:

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State Kenneth W. Detzner

Florida Democratic Party  
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