

**IN THE SUPREME COURT OF FLORIDA**

BLACK VOTERS MATTER  
CAPACITY BUILDING INSTITUTE,  
INC., LEAGUE OF WOMEN VOTERS  
OF FLORIDA, EQUAL GROUND,  
FLORIDA RISING TOGETHER, et  
al.,

*Petitioners,*

v.

CORD BYRD, in his official capacity  
as Florida Secretary of State, et al.,

*Respondents.*

CASE NO. SC23-1671  
L.T. No.: 1D23-2252 2022-  
ca-000666

**UNOPPOSED MOTION OF CURRENT AND FORMER ELECTED  
OFFICIALS OF NORTH FLORIDA AND BEYOND FOR LEAVE TO  
FILE *AMICI CURIAE* BRIEF IN SUPPORT OF PETITIONERS**

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*\*pro hac vice* to be submitted

*Counsel for Amici Curiae*

Proposed *Amici Curiae* are a group of current and former elected officials in North Florida and across the state with an interest in representation for communities of color in their jurisdictions (“Proposed *Amici*”). Pursuant to Florida Rule of Appellate Procedure 9.370, Proposed *Amici* move for leave to file an *amici curiae* brief in support of Petitioners and state as follows:

1. This case concerns a matter of significant public interest. At issue in this litigation is the representation of communities of color in Florida’s congressional delegation and the proper analysis of the Fair Districts Amendment, passed directly by the voters.

2. Proposed *Amici* are a group of current and former state and local representatives located in North Florida and beyond. Many currently serve as state representatives and senators as well as city commissioners, and several formerly held these titles as well. In their roles, Proposed *Amici* have a long-standing commitment to racial justice and representation for the communities they serve.

3. Because of their roles as community and elected leaders, Proposed *Amici* are particularly equipped to understand the importance to members of their communities of seeing themselves reflected in their leaders. Many local leaders are the product of

Congressional and other offices that were helmed by Black politicians.

4. In addition, Proposed *Amici* can provide relevant arguments concerning the deep and shared history of Black communities in North Florida and this case's implications for the political futures of this community. Such information will aid the Court's consideration of the crucial issues in this case.

5. Counsel for Proposed *Amici* have conferred with counsel for all parties in the case. Petitioners have consented to the request for leave sought by Proposed *Amici* and all Respondents have stated that they do not object to the requested leave. Therefore, this motion is unopposed.

For these reasons, Proposed *Amici* respectfully request that this Court grant this Unopposed Motion for Leave to File *Amici Curiae* Brief in Support of Petitioners.

Respectfully submitted,

/s/ Matthew A. Goldberger

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*Counsel for Amici Curiae*

Dated: March 11, 2024

**CERTIFICATE OF SERVICE**

I, Matthew A. Goldberger, HEREBY CERTIFY that a true and correct copy of the foregoing Unopposed Motion for Leave to File *Amici Curiae* Brief in Support of Petitioners was filed Electronically with the court via the Florida E-Filing Portal, which provides notice to all parties.

In addition, I served a copy of this Unopposed Motion on all parties at the following email addresses:

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