

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

ROBERT L. VAZZO, LMFT, individually
and on behalf of his patients, and
DAVID H. PICKUP, LMFT, individually
and on behalf of his patients,

Plaintiffs,

Case No.: 8:17-cv-02896-CEH-AAS

vs.

CITY OF TAMPA, FLORIDA,

Defendant,

EQUALITY FLORIDA,

Intervenor-Defendant
(Motion Pending).

**PROPOSED INTERVENOR-DEFENDANT EQUALITY FLORIDA'S
MOTION TO REQUEST ORAL HEARING ON MOTION TO DISMISS**

Proposed Intervenor-Defendant Equality Florida (hereinafter "Equality Florida"), through undersigned counsel, hereby requests an oral hearing with respect to its Motion to Dismiss Plaintiffs' Complaint filed in this action. In support of this request, Equality Florida states as follows:

1. On December 4, 2017, Plaintiffs filed their Complaint in this action. Dkt. 1
2. On January 12, 2017, Equality Florida filed its Motion to Intervene in this matter,¹ and, contemporaneously therewith, filed its Motion to Dismiss the Complaint.

¹ The Motion to Intervene is pending before this Court at the time of filing the instant motion.

3. This case presents important legal issues that implicate government police power to protect minors.

4. As such, Equality Florida respectfully requests an oral hearing on the Motion to Dismiss as the oral hearing will assist the Court in fully understanding these important legal issues and resolving the motion. Equality Florida anticipates that two hours will be sufficient for the oral hearing.

WHEREFORE, Proposed Intervenor-Defendant Equality Florida respectfully requests that the Court grant this Motion to Request Oral Hearing on Motion Dismiss, along with any other relief the Court deems just and proper.

Respectfully submitted,

/s/ Sylvia Walbolt

Sylvia H. Walbolt

Florida Bar No. 0033604

swalbolt@carltonfields.com

Brian C. Porter

Florida Bar No. 0120282

bporter@carltonfields.com

CARLTON FIELDS JORDEN BURT, P.A.

4221 W. Boy Scout Boulevard

Tampa, FL 33607-5780

Telephone: (813) 223-7000

Facsimile: (813) 229-4133

*Shannon Minter

sminter@nclrights.org

*Christopher Stoll

cstoll@nclrights.org

NATIONAL CENTER FOR

LESBIAN RIGHTS

870 Market Street

Suite 370

San Francisco, CA 94102

Telephone: (415) 392-6257

*Pro Hac Vice Applications Forthcoming

*Scott McCoy
Florida Bar No. 1004965
scott.mccoy@splcenter.org
*David Dinielli
david.dinielli@splcenter.org
*John Tyler Clemons
tyler.clemons@splcenter.org
SOUTHERN POVERTY LAW CENTER
106 East College Avenue
Tallahassee, FL 32301
Telephone: (850) 521-3042
*Pro Hac Vice Applications Forthcoming

*Attorneys for Intervenor Defendant
Equality Florida Institute Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 12, 2018, the foregoing was electronically filed with the Clerk of Court by using the CM/ECF system, which will also send a notice of electronic filing to all counsel of record.

/s/ Sylvia Walbolt
Attorney