

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION**

**EQUALITY FLORIDA**, et al.,

*Plaintiffs,*

v.

No. 4:22-cv-134-AW-MJF

**RON DESANTIS**, in his official capacity  
as Governor of Florida, et al.,

*Defendants.*

---

**UNOPPOSED MOTION FOR EXPANSION OF WORD LIMIT  
APPLICABLE TO THE STATE DEFENDANTS' MOTION TO DISMISS**

As set forth below, the State Defendants respectfully ask the Court to expand the word limit applicable to their motion to dismiss.

1. Under Local Rule 7.1(f), motions are limited to 8,000 words. The State Defendants ask the Court to expand that limit to 13,000 words.

2. The operative complaint comprises 114 pages of allegations and brings six substantive counts on behalf of 18 Plaintiffs against 18 Defendants. Plaintiffs are students and teachers at various grade levels, parents, and organizations with varied membership, each alleging injuries that give rise to unique justiciability issues.

3. The State Defendants are Governor Ron DeSantis, the Florida State Board of Education, each member of the State Board of Education (Thomas R. Grady, Ben Gibson, Monesia Brown, Esther Byrd, Grazie P. Christie, Ryan Petty, Joe York), the

Florida Department of Education, and Florida Commissioner of Education Manny Diaz.<sup>1</sup> Their motion to dismiss is a consolidated response to the amended complaint by eleven defendants and sets forth multiple independent reasons why each claim against them should be dismissed.

4. The State Defendants do not oppose a similar expansion of the word count applicable to Plaintiffs' opposition.

5. Undersigned counsel has conferred with counsel for Plaintiffs and is authorized to represent that Plaintiffs do not oppose this motion.

---

<sup>1</sup> The Amended Complaint names as a defendant Jacob Oliva, who was the interim Commissioner of Education when the complaint was filed. Commissioner Richard Corcoran resigned on May 1, and the State Board of Education appointed Senator Manny Diaz Jr. to serve as his successor beginning June 1. On June 1, Commissioner Diaz automatically substituted for Mr. Oliva as a defendant in this litigation by operation of law.

Respectfully submitted,

ASHLEY MOODY  
ATTORNEY GENERAL

Henry C. Whitaker (FBN 1031175)  
SOLICITOR GENERAL

/s/ Daniel William Bell  
Daniel William Bell (FBN 1008587)  
CHIEF DEPUTY SOLICITOR GENERAL

Bilal Faruqui (FBN 15212)  
ASSISTANT ATTORNEY GENERAL

Anita Patel (FBN 70214)  
ASSISTANT ATTORNEY GENERAL

Office of the Attorney General  
The Capitol, P1-01  
Tallahassee, Florida 32399-1050  
(850) 414-3300  
(850) 410-2672 (fax)  
daniel.bell@myfloridalegal.com

*Counsel for Governor Ron DeSantis, the Florida State Board of Education, Thomas R. Grady, Ben Gibson, Monesia Brown, Esther Byrd, Grazie P. Christie, Ryan Petty, Joe York, Commissioner Manny Diaz, and the Florida Department of Education*

**CERTIFICATE OF CONFERRAL**

Consistent with Local Rule 7.1(B), undersigned counsel conferred with Plaintiffs in good faith about the relief requested in this motion and is authorized to represent that Plaintiffs do not oppose this motion.

**CERTIFICATE OF WORD COUNT**

Consistent with Local Rule 7.1(F), this motion contains 278 words.

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of June, 2022, a true and correct copy of the foregoing was filed with the Court's CM/ECF system, which will provide service to all parties.

/s/ Daniel William Bell  
Chief Deputy Solicitor General