

IN THE SUPREME COURT OF FLORIDA

CASE NO. SC2016-616
L.T. Case No. 3D14-2603

SILVIO MEMBRENO AND FLORIDA
ASSOCIATION OF VENDORS, INC,

Plaintiff,

vs.

THE CITY OF HIALEAH, FLORIDA,

Defendant.

NOTICE OF INTENT TO FILE BRIEF AS AMICUS CURIAE

The Cosac Foundation, Inc., d/b/a The Homeless Voice (Homeless Voice) pursuant to Rule 9.370 (d) of the Florida Rules of Appellate provides Notice of it's intent to seek leave to file an Amicus Brief on the Merits should this Court accept Jurisdiction.

The Homeless Voice is a bi-monthly Newspaper which disseminates and advocates news and information on homeless issues through out Florida but particularly in Miami-Dade and Broward Counties. It is distributed through a Street Vending Program on the streets and sidewalks throughout these areas. The Homeless Voice is distributed by the homeless and the working poor. As an advocate, the Homeless Voice is aware that street and sidewalk vending for various commercial enterprises is an entry level occupation to many of the homeless and working poor who would otherwise be left unemployed. The ordinance in question would significantly impact the homeless and working poor. The Homeless Voice has an interest in seeking to limit municipalities enacting ordinance which limit the homeless and working poor opportunities to seek and obtain employment.

CERTIFICATE OF SERVICE

I hereby certify that on this 16 day of May, 2016, a true and correct copy of the foregoing was filed and served electronically on the following counsel of record: Justin Pearson and Robert Peccola, Email: jpearson@ij.org and rpeccola@ij.org; Michael Fertig and Jennifer C. Glasser, Email: Michael.fertig@akerman.com, Jennifer.glasser@akermans.com and merari.motola@akerman.com; Katherine E. Giddings and Diane G. DeWolf, Email: giddings@akerman.com, diane.dewolf@akerman.com, elisa.miller@akerman.com and michele.rowe@akerman.com.

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