

IN THE SUPREME COURT OF FLORIDA

Case No. SC2016-616

SILVIO MEMBRENO and
FLORIDA ASSOCIATION OF
VENDORS, INC.,

Petitioners,

L.T. Case No. 3D14-2603

vs.

THE CITY OF HIALEAH,
FLORIDA,

Respondent.

**NOTICE OF INTENT TO SEEK LEAVE TO FILE AN AMICUS BRIEF ON
THE MERITS**

Yvonne Castaneda, pursuant to Rule 9.370(d), Florida Rules of Appellate Procedure, hereby files this notice of intent to seek leave to file an amicus brief on the merits in support of Petitioners should the Court accept jurisdiction.

Ms. Castaneda will describe rational basis review under the Texas Constitution, which was marked by conflicting cases about the nature of the test, including whether the test forbade judicial speculation, required analysis of record evidence, or looked at the oppressiveness of the laws at issue. The Texas Supreme Court recently decided these issues in a case similar to this one, and Ms. Castaneda believes it will be helpful for the Court to hear how another state supreme court handled a similar issue.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of May, 2016, a true and correct copy of the foregoing was filed and served electronically on the following counsel of record:

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