

BUY™

SELL™

SHOP™



Downloaded From
www.TextBookDiscrimination.com



SELL YOUR OWN SAMPLES

(help others get the justice that they deserve)



BUY™

SELL™

SHOP™

www.TextBookDiscrimination.com

Get ***Booked Up*** on Justice!

© TBD Corporation. All Rights Reserved.

**STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS**

**FLORIDA MEDICAL ASSOCIATION, INC.,
FLORIDA OSTEOPATHIC MEDICAL
ASSOCIATION; FLORIDA PODIATRIC
MEDICAL ASSOCIATION,**

Petitioners,

v.

Case No. 12-1545RP

**STATE OF FLORIDA, DEPARTMENT OF
HEALTH, BOARD OF NURSING,**

Respondent,

and

**FLORIDA ASSOCIATION OF NURSE
ANESTHETISTS and FLORIDA NURSES
ASSOCIATION,**

Intervenors.

**FLORIDA ASSOCIATION OF NURSE ANESTHETISTS'
MOTION FOR LEAVE TO FILE A REPLY MEMORANDUM
AND REQUEST FOR ORAL ARGUMENT**

The Florida Association of Nurse Anesthetists ("FANA"), respectfully requests permission to file a memorandum in reply to Petitioners' June 21, 2012 response to FANA's motion to determine the sufficiency of Petitioners' objections to requests for admissions; and further requests that the Administrative Law Judge hear oral argument on the issues raised therein by Petitioners. As grounds, FANA would show:

1. As evidenced by the Petitioners' June 21, 2012 response to FANA's motion addressing Petitioners' objections to requests for admissions; and also Petitioners' June 20, 2012 response to the Board of Nursing's motion to compel, there is substantial and fundamental disagreement between the parties on the scope of the evidence and the issues in this proceeding.

This substantial and fundamental disagreement, unless resolved, is certain to spawn additional discovery disputes going forward.

2. Reply memoranda are not authorized by the Uniform Rules of Procedure. FANA respectfully suggests that a reply to Petitioners' arguments would assist the Administrative Law Judge in arriving at a resolution of this dispute that is fair and just.

3. FANA further requests that the Administrative Law Judge hear oral argument on the issues raised by Petitioners in their responses to the Board of Nursing's and FANA's motion.

4. The undersigned has contacted counsel for all parties about the contents of this motion and their respective positions are as follows:

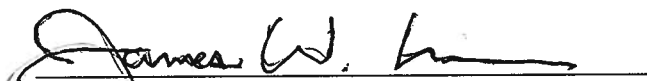
Petitioner Associations: No objection. Petitioners intend to file a motion in limine regarding the evidence to be presented at trial, and have no objection to oral argument on the motion in limine as well as the issues raised in Petitioners' response to FANA's motion to determine the sufficiency of Petitioners' objections to requests for admissions.

Respondent Board of Nursing: No objection.

Intervenor Florida Nurses Association: No objection.

Respectfully submitted,

Lewis Longman & Walker, P.A.



James W. Linn, Florida Bar No. 312916
Glenn E. Thomas, Florida Bar No. 489174
Paul H. Amundsen, Florida Bar No. 266450
315 South Calhoun Street, Suite 830
Tallahassee, Florida 32301
Telephone: (850) 222-5702
E-Mail: pamundsen@llw-law.com

Attorneys for the Florida Association of Nurse
Anesthetists

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been provided this 22nd day of June 2012, by U.S. Mail and electronic mail to:

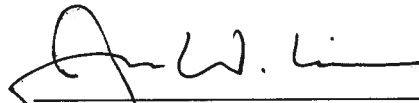
Lee Ann Gustafson, Esquire
Department of Legal Affairs
The Capitol, Plaza Level 01
Tallahassee, FL 32399
leeann.gustafson@myfloridalegal.com

Wendy Smith Hansen, Esquire
Florida Podiatric Medical Association
9670 Deer Valley Drive
Tallahassee, FL 32312
Wendy_hansen@comcast.net

Holly Randall Miller, Esquire
Jeffery M. Scott, Esquire
Florida Medical Association
113 East College Avenue
Tallahassee, FL 32301
hmiller@flmedical.org
jscott@flmedical.org

Jason David Winn, Esquire
Jason D. Winn, P.A., Attorney at Law
Suite 2-C
119 East Park Avenue
Tallahassee, FL 32301
jwinn@jwinnlaw.com

Cynthia A. Mikos, Esquire
Allen and Dell, P.A.
202 South Rome Avenue, Suite 100
Tampa, Florida 33606-1854
cmikos@allendell.com



James W. Linn

BUY™

SELL™

SHOP™



Downloaded From
www.TextBookDiscrimination.com



SELL YOUR OWN SAMPLES

(help others get the justice that they deserve)



BUY™

SELL™

SHOP™

www.TextBookDiscrimination.com

Get ***Booked Up*** on Justice!

© TBD Corporation. All Rights Reserved.