

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION**

ALACHUA COUNTY EDUCATION ASSOCIATION, *et al.*,

Plaintiffs,

v.

DONALD J. RUBOTTOM, in his official capacity as chair of the Florida Public Employees Relations Commission, *et al.*,

Defendants.

Case 1:23-cv-00111-MW-HTC

**PERC DEFENDANTS' CROSS-MOTION FOR SUMMARY
JUDGMENT AND COMBINED OPPOSITION TO PLAINTIFFS'
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56 and Local Rule 7, PERC Defendants Donald Rubottom, Jeff Aaron, and Michael Sasso, in their official capacities as members of PERC (the "PERC Defendants"), move for summary judgment on all of Plaintiffs' claims. The PERC Defendants file the attached memorandum in support of their cross-motion for summary judgment, combined with their opposition to Plaintiffs' motion for partial summary judgment (ECF 98, 99-1).

ORAL ARGUMENT REQUESTED

Pursuant to Local Rule 7.1(K), the PERC Defendants concur in Plaintiffs' request for oral argument, ECF 98, at 2, and likewise request oral argument on their Cross-Motion for Summary Judgment. ECF 107, at 23. Plaintiffs continue to hold open the week of November 13-17 in case the Court grants oral argument on these cross motions. *See* ECF 107, at 3.

Dated: October 6, 2023

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Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(F) undersigned counsel for the PERC Defendants certifies that the above motion, excluding those portions excluded by Local Rule 7.1(F), consists of 133 words.

/s/ Bryan Weir
Bryan Weir

CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2023, I electronically filed the foregoing via CM/ECF, which automatically serves all counsel of record for the parties who have appeared.

/s/ Bryan Weir
Bryan Weir