

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

ALACHUA COUNTY EDUCATION
ASSOCIATION, *et al.*,

Plaintiffs,

v.

DONALD J. RUBOTTOM, *et al.*,

Defendants.

Civil Action No.
1:23-cv-00111-MW-HTC

**PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT
AND REQUEST FOR ORAL ARGUMENT**

Pursuant to Federal Rule of Civil Procedure 56 and Local Rule 7, Plaintiffs Alachua County Education Association, United Faculty of Florida–University of Florida, United Faculty of Florida, Lafayette Education Association, Pinellas Classroom Teachers Association, Hernando United School Workers, Florida Education Association, and Malini Schueller hereby move for partial summary judgment as to Counts Four, Five, Six, and Seven of their Second Amended Complaint.

ORAL ARGUMENT REQUESTED

Pursuant to Local Rule 7.1(K), Plaintiffs respectfully request oral argument of their Motion for Partial Summary Judgment. Plaintiffs estimate that 30 minutes per side would be required for argument of this Motion. Plaintiffs expect this motion to be fully briefed by October 24, 2023, and, consistent with the consent motion filed on August 17, 2023 (ECF No. 90), they request a hearing on November 1st, 2nd, or 3rd, or the week of November 13, to the extent that is consistent with the Court's schedule.

Respectfully Submitted,

s/ Leon Dayan
Leon Dayan

DATED: September 5, 2023

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RULE 7.1(F) CERTIFICATION

Pursuant to Local Rule 7.1(F), undersigned counsel for the Plaintiffs certifies that the foregoing Motion for Partial Summary Judgment, excluding those portions excluded by Local Rule 7.1(F), consists of 152 words.

/s Leon Dayan
Leon Dayan

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of September, 2023, I electronically filed the foregoing via CM/ECF, which automatically serves all counsel of record for the parties who have appeared.

/s Leon Dayan
Leon Dayan