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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA, TALLAHASSEE DIVISION

ELIAS MAKERE, FSA, MAAA)

Plaintiff)

v.)

E. GARY EARLY; MARTIN
FITZPATRICK; STANLEY
GORSICA; KIRK HIGGINS; SCOTT
RANGLES; CHARLES SCHREIBER;)
MARK WALKER; USFLND;
ALLSTATE,

Defendant)

Case No (LT)
4:21-cv-00096

PLAINTIFF'S MOTION TO TRANSFER VENUE

Plaintiff, ELIAS MAKERE, on this 14th day of April 2022,
respectfully asks this Court to transfer this case to the
Middle District of Florida.

Key Points:

A.) Grounds proper court;

B.) Points 28 USC §455; witness convenience; no prejudice

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*As the scales of justice await
in a sister court, may this
brother court transfer his
weight there...*

where...

*...all can bare all with
minimal wherewithal.*

Background: Plaintiff added eight co-defendants to this case
Problem: This Court is one such co-defendant
Request: Court transfers this case to an appropriate court

Rule 1 | Fed. R. Civ. P. | Scope and Purpose

"[These rules] should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding."

Local Rule 3.1(C) | USFLND | Transfer; Place of Keeping File

"A case will remain pending in the division where it was filed unless the Court enters an order transferring it."

Local Rule 1.07(a)(1) | USFLMD | Successive Action

"If an action is docketed, assigned, and terminated; later re-filed without a material change in the issues or the parties; and assigned to a judge other than the judge originally assigned, the originally assigned judge should accept the transfer."

Precedence

- 3:20-mc-00049-MCR-GRJ - USFLND (9/21/20)
- 3:21-mc-00068-MCR-GRJ - USFLND (12/30/21)
- 4:22-cv-00086-MW-MAF - USFLND (3/2/22)

USFLND has recently transferred cases on similar grounds

Abbreviations

- [C###] - Paragraph ### from 'This Complaint'
- 1DCA - Florida's First District Court of Appeals
- FCHR - Florida Commission on Human Relations
- FS - Florida Statute
- USFLMD - US District Court, Florida, Middle District
- USFLND - US District Court, Florida, Northern District

MOTION

I. Pertinent History

1. On August 12, 2020, Plaintiff sued Allstate for employment discrimination at USFLMD (3:20-cv-00905) (hereinafter "That Case"). His cause was under 42 USC §1981 ("§1981"), 42 USC §1981a ("§1981a"), 42 USC §1985 ("§1985"), §760 FS, Title VII, and the Equal Pay Act ("EPA").^{1/}
2. Nine days later - on August 21, 2020 - Allstate moved to dismiss. Attaching a document ("That Document") which was written by Defendant Early. Since that date, Allstate has filed That Document multiple times (eg. 3/12/21; 5/21/21; 11/23/21; etc.). That Document, importantly, was perjured and destined for legal attack.
3. In a related action, Plaintiff - in September 2020 - asked the FCHR whether it accepted bribes (§760.06(4); see **[C042]** for context). Many months later, the agency responded that there was "no doubt" that it had to obey bribery laws (highlights added):

"Given the fact that the words "[w]ithin the limitations provided by law [emphasis added]" plainly appear within 760.06(4), Florida Statute, there is no doubt to resolve, and there is no controversy to address with regard to whether respondents are permitted to bribe the Commission."

- FCHR | Final Order 21-029 | 3/31/21

4. On-or-around January 31, 2021, Plaintiff initiated this lawsuit ("This Case") against Defendant Early (in this Court). Suing him under 42 USC §1983 ('*Ku Klux Klan Act of 1871*') for violating Plaintiff's constitutional rights (1st, 7th, and 14th amendments) as Defendant Early acted under the '*color of state law*'. Acts which included - but were not limited to - (a) **destruction of evidence**; (b) **perjury**; and (c) **bribery**.

a) Defendant Early executed his perjury, importantly, in That Document (¶2, *supra*).

5. On May 21, 2021, Allstate responded to a Plaintiff motion. Therein, the former employer attached That Document once again. This time, importantly, Allstate reiterated Defendant Early's perjury.

a) Such conduct spurred two motions from Plaintiff. The first was a *Motion for Sanctions* (6/11/21); and the second was a *Motion in Limine* (6/17/21).

b) Each motion attacked: (i) That Document; (ii) Allstate's perpetuation of Defendant Early's perjury; and (iii) Allstate's perpetration of a fraud upon USFLMD ("That Court").

6. On November 6, 2021 - and in response to an order from That Court - Plaintiff amended the complaint ("That Complaint") in That Case.

- a) That Complaint, importantly, further detailed the harmful effects of Defendant Early's perjury. Charging Allstate with perpetrating that fraud into That Court.
7. On-or-around December 31, 2021 - and after an 11th Circuit mandate - Plaintiff amended his complaint in This Case. Therein, he included a cause of action under 42 USC §1985 (*conspiracy*).
8. On January 28, 2022, Florida's First District Court of Appeals ("1DCA") affirmed the FCHR's 'no doubt' Final Order (§3 *supra*).
9. The following month, Plaintiff served Defendant Early with a summons. Soon thereafter, an attorney (Charles Schreiber, Jr.) appeared on Defendant Early's behalf. That attorney's appearance was in This Court on March 11, 2022 (in This Case).
10. On account of numerous acts (ie, 1DCA's affirmation, Schreiber, This Court, and more), Plaintiff further amended his complaint ("This Complaint") - in This Case (in This Court). Doing so on April 12, 2022 via a *motion for leave to amend*.

II. Analysis

11. This Complaint operates under 28 USC §1343, 28 USC §1346, 42 USC §1981, 42 USC §1983, and 42 USC §1985.

a) Notably, This Complaint details how some of Defendants' unlawful conduct was committed within the jurisdiction of USFLMD; while other conduct was committed within USFLND's territory { [C006] , [C019] , [C060] - [C073] , [C091] - [C104] }.

12. It charges private actors, state actors, and federal actors with violating Plaintiff's civil rights, and his constitutional rights.

a) The main defendant is still Defendant Early.

b) Three of the eight co-defendants are:

- i. USFLND Magistrate Martin Fitzpatrick;
- ii. USFLND Chief Judge Mark Walker; and
- iii. USFLND (itself).

c) Another co-defendant, importantly, is Allstate.

13. Speaking of Allstate, That Case names Plaintiff's former employer as its sole defendant. It - like This Case - has a charge for civil conspiracy under 42 USC §1985.

a) That Case - unlike This Case - has seen twenty-four (24) subpoenas directed to Jacksonville-area witnesses. By comparison, This Case has not seen any subpoenas whatsoever.

14. Also, That Case has been in That Court for the past twenty (20) months (ie, since August 2020; ¶1 *supra*). This Case, by

comparison, has been in This Court for the past fourteen (14) (ie, since February 2021; ¶4 *supra*).

a) Further analysis reveals that the adjudication of This Case was dormant for eight (8) months {4/29/21 dismissal through 12/30/21 reversal}; and only adversarial for one (1) {3/11/22 until now}.

b) In other words, **This Case** (in This Court) **is new**.

15.1DCA cemented the fact that the FCHR - and Mr. Stanley Gorsica ("Gorsica") - had clear knowledge that §760.06(4) did not permit it/him to accept bribes. FCHR bribery & impropriety, importantly, was a matter Plaintiff presented to That Court.^{2/} Presenting so before doing the same in This Court.

16. Moreover, That Case has been dealing with the facts surrounding Defendant Early's perjury since inception (¶2). That Case knew about the civil conspiracy (charged in This Case) before any defendant appeared herein (¶5a vs ¶9).

17. By virtue of This Complaint, This Court is adjudicating itself. Justice and common sense proscribe such a thing. Justice and common sense, alternatively, prescribe transfer.

III. Standard of Review

18. Rule 1 Fed. R. Civ. P. provides persuasive authority to transfer This Case in order to "*secure the just, speedy, and inexpensive determination*" of all civil actions.

19.28 USC §1404(a), more powerfully, provides statutory authority for transferring a case (highlights added):

"For the convenience of parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought or to any district or division to which all parties have consented."

- 28 USC §1404(a) | 2020

20. District courts have used this statute to set the standard for reviewing transfer motions:

"Rather, the standard is set by statute: "For the convenience of parties and witnesses, [and] in the interest of justice."

- Mobil v SEC, 550 F.Supp. 67 (USNYSD 1982)

21. The Northern District of Illinois (USILND) goes deeper:

"In order to meet the requirements of § 1404(a), the movant must establish "(1) that venue is proper in the transferor district; (2) that the transferor court has the power to transfer the case (that is, that the transferee court is in a district 'where it might have been brought'); and (3) that the transfer is for the 'convenience of parties and witnesses, in the interest of justice.'" Hess v. Gray, 85 F.R.D. 15, 24 (N.D.Ill. 1979)."

- Hotel v. Seagrave, 543 F.Supp. 1048 (USILND 1982)

22. In short, Plaintiff must show that:

a) USFLND is a proper venue;

- b) USFLMD is also a proper venue; and
- c) Transfer will serve (a) the convenience of parties/witnesses; and (b) the interest of justice.

23. Those first two prongs are rather simple, according to the Hotel court. That third prong, though, is explained like this:

"The Court now turns to requirement (3). To support a motion to transfer, the movant must show a "clear balance of inconvenience" in this district over the transferee district. SEC v. First National Finance Corp., 392 F. Supp. 239, 240 (N.D.Ill. 1975) In determining whether the movant has met this burden, the Court must consider the factors specifically mentioned in § 1404(a) (convenience of the parties, convenience of the witnesses and the interests of justice in general) while also giving weight to plaintiff's choice of forum."

- Hotel v. Seagrave, 543 F.Supp. 1048 (USILND 1982)

24. These 'factors for consideration' were further delineated in Pennsylvania's Eastern District:

"Motions to transfer are determined by consideration of the same factors relevant to a determination of a forum non conveniens motion. Norwood v. Kirkpatrick, 349 U.S. 29, 75 S. Ct. 544, 99 L. Ed. 789 (1955). They are:

1. relative ease of access to sources of proof;
2. availability of compulsory process for attendance of unwilling witnesses;
3. cost of attendance at trial by willing witnesses;

4. the possibility of view of the premises, if appropriate;
5. all other practical problems that make trial of a case easy, expeditious, and inexpensive;
6. "public interest" factors, including the relative congestion of court dockets, choice of law considerations, and the relation of the community in which the courts and jurors are required to serve to the occurrences that give rise to the litigation.

Gulf Oil Corp. v. Gilbert, 330 U.S. 501, 508-09, 67 S. Ct. 839, 843, 91 L. Ed. 1055 (1947)."

- Schmidt v. Leader Dogs, 544 F.Supp. 42 (USPAED 1982)

25. That last factor (ie, 6) speaks to **judicial economy**. The Supreme Court has spoken on this pillar, too (highlights added):

"To permit a situation in which two cases involving precisely the same issues are simultaneously pending in different District Courts leads to the wastefulness of time, energy and money that § 1404(a) was designed to prevent."

- Continental Grain v The FBL-585, 364 US 19 (1960)

As has the Third Circuit (highlights added):

"Moreover, we also believe that in an appropriate case the court may properly consider whether judicial efficiency would be served by enabling the judge who has presided over the pre-trial phase of a multi-district proceeding, and thereby has become familiar with the parties and the

issues, to try the actions himself rather than to return them to one or more district judges who must acquaint themselves with the cases' complexities."

- In Re Fine Paper, 685 F.2d 810 (3d Cir. 1982)

Ditto for Delaware's district court (highlights added):

"One of the prime components of the "interest of justice" is the maintenance of sound judicial administration... Central to efficient and effective judicial administration is a policy, implied in section 1404(a), of proper conservation and utilization of judicial resources."

- Smithkline v Sterling, 409 F.Supp. 52 (USDEAD 1975)

That same Delaware court - in a different case - further elaborated this principle (highlights added):

"In Abbott Laboratories, supra, 387 U.S. at 154-5, 87 S. Ct. at 1519, the Supreme Court discussed the government's fear of a "multiplicity of suits in various jurisdictions" all dealing with the same subject matter. The Court stated:

The short answer to this contention is that the courts are well equipped to deal with such eventualities. The venue transfer provision, 28 U.S.C. § 1404(a), may be invoked by the Government to consolidate separate actions.

There can be no argument with the position that the avoidance of multiple litigation of the same, or related, issues in more than one court, and the resulting conservation

of judicial resources, is a strong interest of justice factor."

- Amoco v US DOE, 469 F.Supp. 236 (USDEAD 1979)

Notably, New York's Southern District expounded on a pertinent element (highlights added):

"Allowing [the transferee judge] to interpret the scope of [plaintiff's] protective order would be the most efficient use of judicial resources. Moreover, a transfer to the District of Columbia court avoids duplication of judicial efforts since that court has at least some familiarity with these documents. Thus, the public interest in conserving judicial resources strongly supports my decision to transfer this action."

- Mobil v SEC, 550 F.Supp. 67 (USNYSD 1982)

26. Altogether, the courts have established a **3-prong standard of review** (for a motion to transfer venue). And that third prong is broken down into **six parts**. The last such part is **dominated by judicial economy**.

IV. Application to the Instant Case (Makere v Early)

27. Now, Plaintiff will hereby show that all three of those prongs - and all six of those subparts - are in Plaintiff's favor.

A) USFLND is a Proper Venue

28. USFLND is indeed a proper venue, for three reasons:

- a) As detailed in This Complaint, Defendant Early committed much of his misconduct within USFLND's territory;
- b) Defendant Early lives in this district; and
- c) This Court has empowered itself to transfer cases (please see Local Rule 3.1 USFLND).

29. According to precedence set by the Hotel court, these facts satisfy the first prong (highlights added):

"Requirements (1) and (2) are met in this case. Venue is proper in this district because plaintiff resides in Illinois for venue purposes"

- Hotel v. Seagrave, 543 F.Supp. 1048 (USILND 1982)

B) USFLMD is a Proper Venue

30. The Middle District is also a proper venue, for five reasons:

- a) As detailed in This Complaint, Defendant Early committed some of his misconduct within USFLMD's territory;
- b) Plaintiff lives in this district;
- c) Allstate committed almost all of its misconduct within the Middle District;
- d) Allstate is located in this district; and
- e) USFLMD has empowered itself to receive transferred cases (please see Local Rules 1.04/1.07/3.02 USFLMD).

31. According to that same Hotel precedent, this satisfies the second prong (highlights added):

"Requirements (1) and (2) are met in this case. Venue is proper in this district because plaintiff resides in Illinois for venue purposes, and this action could have been brought in the [transferee district], which has proper jurisdiction because defendants reside there under 28 U.S.C § 1332 and 1391."

- Hotel v. Seagrave, 543 F.Supp. 1048 (USILND 1982)

C) Convenience of Parties/Witnesses and 'Interest of Justice'

32. Third, transferring This Case to the Middle District would
(a) be more convenient for the parties/witnesses; and (b) better serve the 'interest of justice'. Therefore, it will satisfy the final prong.

[1] ease of access to proof

33. For starters, evidence will be as equally accessible at USFLMD as at USFLND. This is so for one main reason: virtually all - if not all - of the evidence will be electronic. Electronically stored information, of course, is as easily accessible in Tallahassee (ie, USFLND) as it is in Jacksonville (ie, USFLMD).

34. Therefore, the first factor is a tie.

[2] availability of compulsory process

35. Likewise, the Middle District is equally capable of serving process as is the Northern District. Both courts sit in a mid-sized city (Jacksonville and Tallahassee, respectively).^{3/} Both courts have nearby sheriff's offices

which can effectuate service (JSO and LCSO, respectively). Plus, both courts have plenty of private process servers who can do the same.

36. Thus, this second factor is also a tie.

[3] cost of attendance at trial

37. Third, the cost of trial attendance will be significantly lower at USFLMD than USFLND.

38. As mentioned, twenty-four (24) Jacksonville-area witnesses have already been identified. USFLMD's courthouse is 16 miles from their workplaces. USFLND, on the other hand, is 190. Thus, holding trial in the transferee court will save 8,352 miles of travel.^{4/}

39. The Hotel court established that this witness calculation is a major factor (highlights added):

"In analyzing the convenience of witnesses, the Court must look to the expenses of transportation and the length of time the witnesses will be absent from their jobs."

- Hotel v. Seagrave, 543 F.Supp. 1048 (USILND 1982)

40. The Hotel court also explained that each party's financial strength is a factor:

"Both plaintiff and defendants will be inconvenienced if this action is brought in the other parties' resident district and the financial strengths of the parties are equivalent."

- Hotel v. Seagrave, 543 F.Supp. 1048 (USILND 1982)

Public records show that the defendants sued in this suit make significantly more than the median salary:^{5/}

Defendant	Annual Salary	Ratio
Defendant Early	\$128,049.72	3.74
Gorsica	\$88,000.12	2.57
Schreiber	\$83,430.36	2.44
Walker	\$268,700.00	7.85

National Median	\$34,248.45	1.00
-----------------	-------------	------

41. Salaries for the witnesses, on the other hand, can be expected to be near the national median. Therefore, relative to incomes, it will be 'significantly' easier for defendants to appear at USFLMD than it could be for witnesses to appear at USFLND.

42. Thus, this third factor favors transfer to USFLMD.

[4] possibility of view of the premises

43. The fourth factor is a nullity in the instant case. Neither the witnesses, judges, nor jurors have a demonstrated need to view the crime sites.

44. So, like the first and second factors, this is a tie.

[5] all other practical problems

45. Similar to number four, this fifth factor is also a nullity.

46. So, this is a tie.

[6] public interest factors

47. The sixth factor, however, is not a tie - by any stretch of the imagination. For it falls in favor of a transfer, heavily.

48. As the Supreme Court explained, the public has an interest in "impartial"/"independent" adjudications (highlights added):

"The primary purpose of the Constitution in providing (Art. I, § 1, cl. 6)... was not to benefit the judges, but to attract fit men to the bench and insure that independence of action and judgment which is essential to the maintenance of the Constitution and the impartial administration of justice. Pp. 248, 253. Such being its purpose, the limitation is to be construed, not as a private grant, but as a limitation imposed in the public interest – not restrictively, but in accord with its spirit and the principle on which it proceeds."

- Evans v. Gore, 253 US 245 (1920)

49. By virtue of being named as a formal party to This Case, USFLND cannot act with any independence or impartiality. Neither can defendant Martin Fitzpatrick ("Fitzpatrick") nor defendant Mark Walker ("Walker").

50. In fact, 28 USC §455(b) prescribes disqualification of Fitzpatrick/Walker because of their lost independence/impartiality:

"[a judge/magistrate] shall also disqualify himself in the following circumstances:

(1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;

(5) *[When he] or his spouse, or a person within the third degree of relationship to either of them, or the spouse of such a person:*

(i) *Is a party to the proceeding, or an officer, director, or trustee of a party;*

(iii) *Is known by the judge to have an interest that could be substantially affected by the outcome of the proceeding;*

(iv) *Is to the judge's knowledge likely to be a material witness in the proceeding."*

- 28 USC §455(b) | 2022

51. This statute, of course, is the product of legislators' work. Legislators, of course, whom the public elected. Which means that this legislative action was in the **public's interest**. Thus, the public has direct interest in Fitzpatrick and Walker relinquishing adjudication of This Case because they are defendants/witnesses in it.

52. The public has a similar interest in USFLND relinquishing its jurisdiction on This Case, because it also has been declared a defendant. These relinquishments - and the USFLND one in particular - are best **accomplished via transfer**.

53. Moreover, as the Amoco court established, the public's interest in the proper administration of justice can often be the dominating factor/prong in considering transfer:

"In my view, the question whether these actions should be transferred to the District of Columbia must be determined solely on the "interest of justice" factors."

- Amoco v US DOE, 469 F.Supp. 236 (USDEAD 1979)

54. So, put briefly, the heavy weight of the sixth factor lands in favor of transfer.

[X] plaintiff's choice of forum

55. As a bonus x-factor, albeit an important one, This Court must also place great weight on Plaintiff's choice of forum.

"a plaintiff's choice of forum is entitled to substantial weight and is thus "a paramount consideration in any determination of a transfer request..."

- Smithkline v Sterling, 409 F.Supp. 52 (USDEAD 1975)

56. In the interest of justice - as well as for the sake of judicial economy - Plaintiff chooses USFLMD to handle This Case (and That Case).

57. So, this x-factor also favors transfer.

V. Summary

58. Altogether, the first two prongs of the 3-prong test are clear-cut. Both support transfer. The third prong places all the weight on transfer, and none of the weight on retention.

"if the factors favoring transfer outweigh the value of litigating the policy issue here and the preference given the

plaintiff's choice of forum, then the case should be transferred."

- Starnes v McGuire, 512 F.2d 918 (DC Cir. 1974)

59. Given this reality, transfer to USFLMD is proper/necessary.

a) Transfer is further encouraged by the lack of prejudice imposed on Defendant Early. A contention supported by the fact that Defendant Early has never claimed prejudice.

VI. Nature of Relief Sought

60. Plaintiff seeks transfer of This Case to That Court. The judges in That Court are already aware of the facts of This Case, and they have been adjudicating a related case for much longer.

a) Plus, That Court has more detail about these Defendants' transgressions (as noted in This Complaint's fourth footnote).^{6/}

61. As such, This Case, That Case, and the public will all receive the transfer benefits described by the Smithkline court:

"Transfer of this action to the Eastern District of Pennsylvania, where it presumably will be assigned to the same Judge currently trying Civil Action No. *56 74-2957, [12] will result in the following benefits: (1) pre-trial discovery can be conducted more efficiently; (2) the witnesses can be saved the time and expense of appearing in more than one tribunal; (3) duplicative litigation can be avoided,

thereby eliminating unnecessary expense to the parties; and (4) inconsistent results can be avoided.”

...

In addition, the Eastern District of Pennsylvania's current familiarity with the issues of fact and law in this case[13] stands as a further and distinct justification in a patent case for granting defendant's motion to transfer.

- Smithkline v Sterling, 409 F.Supp. 52 (USDEAD 1975)

CONFERRAL

On April 13, 2022, Defendant Early told Plaintiff (via email) that he objected to this motion. When asked to disclose the basis for his opposition, though, Defendant Early remained silent.

Two weeks prior, Plaintiff emailed Defendant Early a declaration of bad faith. Doing so on account of Defendant Early's "dishonesty in fact" (*Barron's Legal Dictionary, 5th Edition*). Thus, Plaintiff was not able to 'resolve the issue' through a 'meaningful good faith conference' with Defendant Early; an objective This Court set in Local Rule 7.1(B).

Nevertheless, Plaintiff believes the foregoing presents a compelling (ie, 28 USC §1404(a)) and important (ie, interest of justice; judicial economy; witness benefit) reason for obtaining the requested relief. And Plaintiff will supplement this filing upon further compliance with Local Rule 7.1(B).

CONCLUSION

WHEREFORE, Plaintiff respectfully asks this Court to transfer This Case to the Middle District of Florida (USFLMD).

Dated this 14th day of April 2022.

Respectfully submitted,

/s/ Elias Makere

ELIAS MAKERE, FSA, MAAA, Plaintiff
3709 San Pablo Rd. S # 701
Jacksonville, FL 32224
P: (904) 294-0026
E: justice.actuarial@gmail.com
W: TextBookDiscrimination.com
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CERTIFICATE OF COMPLIANCE

I HEREBY CERTIFY that the size and style of type used in this document is Times New Roman 14-point Font (caption) and Courier New (contents); thus complying with the font requirements of Local Rule 5.1(C) USFLND. Also, pursuant to Local Rule 7.1(F), this document has less than 8,000 words (3,979).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of April 2022, I faxed the foregoing (850.521.3656) to the Clerk of Courts. Which will send an electronic copy to the people on the attached service list.

/s/ Elias Makere

Endnotes:

^{1/} §1981 and §760 were originally charged. §1981a, §1985, Title VII, and EPA were later amended (equitable tolling etc.)

^{2/} please see {Doc #51}, {#52}, and {#73} of 'That Case' (3:20-cv-00905; USFLMD).

^{3/} Based on population

^{4/} $8,352 = 2 \times [(190-16) \times 24]$

Where:

2 = roundtrip multiplier

190 = distance to USFLND

16 = distance to USFLMD

24 = number of witnesses

^{5/} Sources:

- Salaries.MyFlorida.com
- FederalPay.org
- SSA.gov

Note: salaries for other defendants were unavailable/unreliable.

^{6/} This Complaint's fourth footnote reads:

"a more robust account of these core facts can be found [here](#) (3:20-cv-00905; USFLMD)"

Electronic Copy: (text-searchable)

TextBookDiscrimination.Com/Files/USFLND/21000096_GMOT_20220416_112625.pdf

Link to Complaint ([HTML](#), [PDF](#), [Video](#))

SERVICE LIST

Charles J.F. Schreiber, Jr.
Senior Assistant Attorney General

T: 850.414.3672

E: Charles.Schreiber@MyFloridaLegal.com

Office of the Attorney General
The Capitol PL-01
Tallahassee, FL 32399

(appearing for Defendant)

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