

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

KETO NORD HODGES, et al.,

Plaintiffs,

v.

Case No. 8:24-cv-879

BEN ALBRITTON, et al.,

Defendants.

_____ /

UNOPPOSED JOINT MOTION TO CONDUCT MEDIATION OVER ZOOM

Plaintiffs, Senate President Albritton, and Secretary Byrd jointly move this Court to excuse the “in person” attendance requirement in the case management and scheduling order to allow the mediation scheduled for March 26, 2025, to be conducted over Zoom rather than in person in Miami.

Under this Court’s case management and scheduling order, the “lead trial counsel, and each party” “*shall* attend and participate in the mediation conference in person.” Doc.37 at 12 (emphasis in the original). “[S]anctions” may be “impose[d]” “upon lead counsel and parties who do not attend and participate in good faith in the mediation conference.” Doc.37 at 12.

When the parties were briefing Plaintiffs’ motion to enforce Local Rule 4.02(d), Doc.68, Plaintiffs stated that they would prefer a remote mediation, since they “live in Tampa and St. Petersburg.” Doc.68 at 2 n.2. In response, Senate President Albritton

and Secretary Byrd stated that they did not oppose the request. Doc.70 at 2. Their staff and attorneys work in Tallahassee, and the Florida Legislature is currently in session, making it difficult to get a party representative to Miami. This Court denied Plaintiffs' motion without expressly addressing remote mediation. The parties' mediator, Michael Hanzman, is prepared to conduct the mediation over Zoom.

This joint request of the parties is supported by good cause. Remote mediation would reduce the litigation costs in this case and would be more convenient for the parties and their counsel.

WHEREFORE, the parties jointly request that this Court enter an order excusing the "in person" attendance requirement for mediation contained in the Court's case management and scheduling order and permit the parties to mediate this matter on March 26, 2025, over Zoom.

Respectfully submitted,

/s/ David Chen

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Counsel for Florida Senate President Ben Albritton, in his official capacity

LOCAL RULE 3.01(g) CERTIFICATION

The undersigned counsel has conferred with counsel for all other parties and is authorized to represent that the parties agree on the resolution of this motion.

/s/ Daniel Nordby _____
Attorney

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2025, I electronically filed the foregoing with the Clerk of Court by using CM/ECF, which automatically serves all counsel of record for the parties who have appeared.

/s/ Daniel Nordby _____
Attorney