

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION**

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

CATHY SALUSTRI LOPER, et al.,

Defendants.

**DEFENDANTS' MOTION TO DISMISS THIRD AMENDED COMPLAINT AND
FOR STAY OF VEXATIOUS LITIGATION**

Undeterred by this Court's ruling that this "lawsuit is without merit" (DN 149 page 20) and violates Florida's Anti-SLAPP law, Plaintiff has now filed a Third Amended Complaint ("3AC") that reiterates the dscientefamation claim this Court dismissed just weeks ago. The same reasons this Court cited in rejecting that claim apply to this one.

Plaintiff has demonstrated beyond doubt that he is a vexatious litigant, bent on wasting this Court's time and forcing others to incur attorneys' fees fending off his frivolous claims. Accordingly, pursuant to Florida Rule of Civil Procedure 1.140 and Sections 768.295 and 68.093 of the Florida Statutes, Defendants Cathy Salustri Loper and Thursday Morning Media, Inc. ("TMM") (collectively "Defendants"), move this Court to dismiss the Third Amended Complaint with prejudice and to award them their costs and attorneys' fees for responding to that pleading. This action should be stayed while this motion is pending. *See* § 68.093(3)(d), Fla. Stat. (2025).

Background

Plaintiff's Second Amended Complaint ("2AC") accused Defendants of publishing a July 2024 news article (the "Debate Article") in a newspaper called *The Gabber* about four political candidates who participated in a debate prior to a primary election. 2AC ¶¶ 3, 5, 16. Plaintiff was

also a candidate in that election but, because he was not a debate participant, was not mentioned in the article. 2AC ¶ 2, 17. Plaintiff claimed that omitting him from the article amounted to defamation. 2AC ¶¶ 50-56. This Court disagreed and explained why:

[T]he Debate Article, which Plaintiff concedes is the linchpin of this case” ..., never mentions Plaintiff at all, an admission made by Plaintiff. *See* SAC ¶ 17. Accordingly, Plaintiff has not demonstrated that the Debate Article charges Plaintiff with an infamous crime or tends to subject him to hatred, distrust, ridicule, contempt or disgrace or tends to injure him in his business or profession. Moreover, it is clear the gist or main purpose of the Debate Article was to discuss candidates participating in the debate, which did not include Plaintiff. Plaintiff admits that he was not invited to the debate for the congressional campaign. Second Resp. at 6. Although it is technically true that the Contempt Article described the debate participants as “the four candidates” for the political office in question, the Debate Article was substantially true as the “gist” of the article was to preview a debate that included those four candidates and excluded Plaintiff.

DN 149 pages 14-15. Accordingly, the Court concluded, Plaintiff’s defamation claim (and all other counts in the Second Amended Complaint) were “without merit.” *Id.* page 20. The Court also found the Anti-SLAPP law applicable (Section 768.295, Fla. Stat. (2024)), and that Defendants are entitled to an award of reasonable attorneys’ fees. *Id.* page 20.

Plaintiff has now repleaded the same failed defamation claim. The Third Amended Complaint, like its predecessor, accuses Defendants of publishing the Debate Article. 3AC ¶¶ 2-3, 8, 13 & Exhibit B. Plaintiff again complains that article referred to the four debating candidates and did not mention him. 3AC ¶¶ 14-21.

As Plaintiff again admits, he was “not invited to” participate in the debate. 3AC ¶ 21. Shortly before the event, Plaintiff learned that a Democratic Party committee “wouldn’t be recognizing him as a qualified candidate and would be denying him all access to party resources, promotion, speaking engagements, and participation in candidate forums and debates.” *See Liccione v. Pinellas Democratic Exec. Comm.*, Case No. 24-002994-CI (Fla. 6th Cir. Ct.) (the

“PDEC Case”) Complaint, DN 134 Tab 4 ¶ 17.¹ As a result, Plaintiff was denied “speaking opportunities at Party events and candidate forums.” *See* PDEC Case First Amended Complaint, DN 134 Tab 5 ¶ 22. Accordingly, a Pinellas Democratic Party news release that was the basis for the article did not mention Plaintiff.² The omission of Plaintiff from the Debate Article, the Third Amended Complaint contends, was defamatory. 3AC ¶¶ 52-65. Plaintiff is wrong again. As this Court has already found, the Debate Article is not actionable.

Argument

I. The Anti-SLAPP law applies to the Third Amended Complaint.

The Third Amended Complaint demonstrates on its face that Florida’s Anti-SLAPP law again is applicable – for the same reasons this Court has already found with regard to Plaintiff’s prior pleadings. According to the Third Amended Complaint, Plaintiff sued Cathy Loper as co-owner and editor of *The Gabber*, the newspaper that published the Debate Article. 3AC ¶¶ 3, 13. TMM likewise is sued for allegedly publishing that newspaper. 3AC ¶ 2. Thus Cathy Loper and TMM are again sued because they exercised the constitutional right of free speech in connection with a public issue. § 768.295(3), Fla. Stat. (2024). The Anti-SLAPP law, therefore, applies, and Plaintiff has the burden of demonstrating that his claims in the Third Amended Complaint are not “without merit.” *Gundel v. AV Homes, Inc.*, 264 So. 3d 304, 314 (Fla. 2d DCA 2019) (disapproved of on other grounds by *Vericker v. Powell*, 406 So. 3d 939 (Fla. 2025)). For the reasons this Court has already found, Plaintiff cannot make such a showing. The Third Amended Complaint is without merit. This motion should be granted and this case dismissed with prejudice.

¹ Copies of documents from Plaintiff’s other litigation were filed in this case on June 3, 2025 (DN 134). Defendants ask that the Court take judicial notice of these records. *See* § 90.202(6), Fla. Stat. (2024).

² *See* “July 13th Congressional District 13 Democratic Candidate Primary Debate,” DN 134 Tab 10. Defendants ask that the Court take judicial notice of this news release. *See* § 90.202(12), Fla. Stat. (2024).

II. The Third Amended Complaint is without merit for the same reasons this Court cited in dismissing Plaintiff's earlier defamation claim.

The reasoning of this Court's October 14 Order (DN 149) applies squarely to the Third Amended Complaint. In this *fourth* attempt to state a cause of action, Plaintiff has simply rehashed and expanded his earlier allegations about the Debate Article. Nothing in the Third Amended Complaint overcomes the defects this Court has already identified. Defendants, therefore, incorporate by reference the case law discussed in their motion to dismiss the Second Amended Complaint (DN 138) and in this Court's October 14 Order (DN 149).

A. The Debate Article did not contain a statement "of and concerning" Plaintiff.

As this Court's October 14 Order found, "the Debate Article never mentions Plaintiff at all." DN 149 page 14. The Debate Article, therefore, was not "of and concerning" Plaintiff. As stated in the article, "the Pinellas Democratic Party host[ed] a debate between four candidates." *See* 3AC Exhibit B. Plaintiff was not one of them, and consequently the Debate Article neither named Plaintiff nor stated any facts about him.

B. The Debate Article was not defamatory of Plaintiff.

As this Court noted, the Debate Article did not charge Plaintiff with an infamous crime or tend to subject him to hatred, distrust, ridicule, contempt or disgrace or tend to injure him in his business or profession. DN 149 page 14. Hoping this Court will reconsider that holding, Plaintiff claims the article "prejudices Plaintiff in the eyes of a substantial and respectable minority of the community" or "deters others from associating with him." 3AC ¶¶ 53-54. Simply reciting those words does not make them so. Because Plaintiff was not mentioned in the Debate Article, nothing in that article prejudiced him or would deter others from associating with him.

C. The Debate Article was not materially false.

The Third Amended Complaint also shows that the Debate Article was not materially false. As this Court's October 14 Order found, "the gist or main purpose of the Debate Article was

to discuss candidates participating in the debate.” DN 149 page 14. Read in that context, nothing in the Debate Article was materially false.

The falsity element of a defamation claim is satisfied only “if the publication is *substantially and materially* false, not just if it is technically false.” *Smith v. Cuban Am. Nat’l Found.*, 731 So. 2d 702, 707 (Fla. 3d DCA 1999) (emphasis added). “As long as a report is substantially correct, it is not necessary that it be exact in every immaterial detail or that it conform to the precision demanded in technical or scientific reporting.” *Readon v. WPLG, LLC*, 317 So. 3d 1229, 1234-35 (Fla. 3d DCA 2021) (internal punctuation omitted). A “statement does not have to be perfectly accurate if the ‘gist’ or the ‘sting’ of the statement is true.” *Smith v. Cuban Am. Nat’l Found.*, 731 So. 2d at 706. In other words, a “statement is not considered false unless it would have a different effect on the mind of the reader from that which the pleaded truth would have produced.” *Id.*

To evaluate whether a publication is materially false, courts “eliminate the alleged falsities” and then assess how the “common mind would understand” the publication without them. *Hill v. Lakeland Ledger Publ’g Corp.*, 231 So. 2d 254, 256 (Fla. 2d DCA 1970). “A publication is not actionable unless the gist of the publication *with* the allegedly defamatory statement conveys a ‘significantly greater opprobrium’ or sting than the publication *without* the alleged falsehood. *See Davis v. McKenzie*, No. 16-62499-CIV, 2017 WL 8809359, at *13 (S.D. Fla. Nov. 3, 2017), *report and recommendation adopted*, No. 16-62499-CIV, 2018 WL 1813897 (S.D. Fla. Jan. 19, 2018). If the alleged falsehoods are eliminated and an article “would not have produced a different effect,” the article is not actionable. *McCormick v. Miami Herald Publ’g Co.*, 139 So. 2d 197, 201 (Fla. 2d DCA 1962).

Plaintiff’s claim of falsity hinges on the single word “the” appearing before the phrase “four candidates.” Plaintiff pretends the article reads:

These are the only candidates. No one else is running. Anyone else you think was running has withdrawn. You may vote for only these four candidates and no one else.

The Debate Article does not say these things and, therefore, was not materially false.

The Debate Article referred to the debate participants as “the Democratic Candidates” and “[t]he four candidates.” The falsity that Plaintiff alleges would be eliminated – and the article would be entirely truthful by Plaintiff’s standards – if the article had omitted the word “the” and referred simply to “four candidates,” or if the article referred to the four debate participants as the “recognized candidates.” As Plaintiff has acknowledged, the Democratic Party “wouldn’t be recognizing him as a qualified candidate” and denied him “participation in candidate forums alongside his four opponents.” PDEC Case Complaint, DN 134 Tab 4 ¶ 42; PDEC Case First Amended Complaint, DN 134 Tab 5 ¶ 22. Even without the word “the” or with the additional word “recognized,” the gist of the article would be same – namely, that the debate would consist of the four recognized candidates. The common mind would come away from the article with the same meaning that Plaintiff alleges – namely, that the Democratic Party held a debate to which only recognized candidates were invited. To be sure, Plaintiff wants more – he would have had the article mention him and his candidacy. But defamation law does not require that. The sting would be the same even if the word “the” were omitted or the word “recognized” were added. Thus the article’s reference to the four debate candidates is substantially true and does not support a defamation claim.

The Third Amended Complaint pretends Defendants had a *duty* to report his candidacy. Plaintiff is wrong as a matter of law, for the reasons this Court has already explained. *See* DN 149 page 16 (judgment of newsworthiness belongs to the publisher). But in any event, as Plaintiff concedes, The Gabber *did* report his candidacy, both before and after the Debate Article. The newspaper published a half-page campaign advertisement from Plaintiff. 3AC ¶ 31 & Exhibit H.

And after the Debate Article was published (but prior to this litigation), the Gabber again reported Plaintiff's candidacy. 3AC Exhibit K. The reporter who wrote the Debate Article also offered to write a profile of Plaintiff before the election, but Plaintiff declined to be interviewed. 3AC ¶ 38 & Exhibit J. And of course Plaintiff's name appeared on the ballot (3AC Exhibit A), and he was able to reach voters through his own advertising (3AC ¶¶ 62). Read in this context, the Debate Article was not materially false.

D. Plaintiff's affidavit from one voter does not change this analysis.

Hoping to create evidence of material falsity, Plaintiff provides an affidavit from one voter (among 51,221 in the primary election³) who allegedly read the Debate Article, noticed Plaintiff was not mentioned, and ultimately voted for another candidate. 3AC Exhibit M. This anecdote is irrelevant, for at least two reasons.

First, whether an article is defamatory is an issue for the Court to decide as a matter of law. *Flynn v. Wilson*, 398 So. 3d 1103, 1111 (Fla. 2d DCA 2024), *review denied*, No. SC2025-0065, 2025 WL 1009410 (Fla. Apr. 2, 2025). The applicable legal standards are *objective*, not subjective. *Jews For Jesus, Inc. v. Rapp*, 997 So. 2d 1098, 1109 (Fla. 2008). One person's alleged subjective reaction to the Debate Article does not inform the Court's objective assessment of whether the article is materially false or is defamatory in the eyes of a "substantial and respectable minority of the community." *Id.* at 1114-15. *See also Davis v. McKenzie*, No. 16-62499-CIV, 2017 WL 8809359, at *11 (S.D. Fla. Nov. 3, 2017) (plaintiff's alleged "reputation among his family and friends" did not satisfy Florida Supreme Court's community standard), *report and recommendation adopted*, No. 16-62499-CIV, 2018 WL 1813897 (S.D. Fla. Jan. 19, 2018).

³ *See* Democratic Primary Election Results, Pinellas County Supervisor of Elections, <https://enr.votePinellas.gov/FL/Pinellas/122163/web.345435/#/detail/0015> (copy attached as Exhibit A). Defendants ask that the Court take judicial notice of the election results. *See* § 90.202(11) & (12), Fla. Stat. (2024).

Because one voter’s testimony does not shed light on this objective matter, Plaintiff’s proffered affidavit is not relevant.

Second, the affidavit does not demonstrate that the Debate Article was *materially* false. The affiant states that she planned to vote for *either* Plaintiff or one of his opponents, Whitney Fox. 3AC Exhibit M ¶¶ 5. After reading the July 12 debate article, the affiant says she decided to vote for Fox a month later. 3AC Exhibit M ¶¶ 6-10. Thus the affiant might well have voted for Fox even without reading the Debate Article. Moreover, judged by an objective standard (as the law requires), a reasonable reader’s voting decision would not be guided by a single, month-old article that did not mention Plaintiff – particularly in light of coverage of Plaintiff’s candidacy in The Gabber and elsewhere before and after the Debate Article and in light of Plaintiff’s own advertising. 3AC ¶ 31 & Exhibit H & Exhibit K; 2AC ¶¶ 39, 62. The alleged defamatory meaning of a statement must be reasonable and not based upon a “stacking of inferences.” *Trump v. Cable News Network, Inc.*, 684 F. Supp. 3d 1269, 1275 (S.D. Fla. 2023). Giving this affidavit any weight would require an unwarranted stacking of inferences. This single voter’s affidavit does not objectively demonstrate that the Debate Article was defamatory.

III. The Third Amended Complaint fails for other reasons.

The Third Amended Complaint also reveals other reasons why this lawsuit is without merit: The pleaded facts demonstrate an absence of actual malice, and the Debate Article is protected by the neutral report privilege. In addition, as a matter of law, damages for an election loss are not recoverable.

A. The Third Amended Complaint fails to plead actual malice with the required convincing clarity.

The Third Amended Complaint’s factual allegations do not meet the constitutional requirement of actual malice. As a candidate for public office, Plaintiff is a public figure, required to plead and to prove with convincing clarity that Defendants published a false statement with

knowledge of its falsity or reckless disregard for whether it was false. *See Cronley v. Pensacola News-Journal, Inc.*, 561 So. 2d 402, 404 (Fla. 1st DCA 1990) (applying actual malice standard to political candidate’s defamation claim against newspaper). Actual malice is a demanding requirement. “Failure to investigate before publishing, even when a reasonably prudent person would have done so, is not sufficient to establish [a knowing falsehood or] reckless disregard.” *Harte-Hanks Commc’ns, Inc. v. Connaughton*, 491 U.S. 657, 688 (1989). The requisite mental state must be brought home to the individuals involved in the decision to publish the alleged falsehood. *New York Times Co. v. Sullivan*, 376 U.S. 254, 287 (1964). To meet the actual malice standard, Plaintiff must “plead sufficient facts to show” that a materially false statement was “fabricated, wholly imaginary, based on an unverified anonymous phone call, inherently improbable, or obviously worthy of doubt.” *Lam v. Univision Commc’ns, Inc.*, 329 So. 3d 190, 198 (Fla. 3d DCA 2021).

The Third Amended Complaint lacks such allegations and in fact demonstrates that actual malice *cannot* be shown. At the time of the Debate Article, considerable reason existed to doubt the status of Plaintiff’s campaign and the viability of his candidacy. Shortly before the debate, Plaintiff was told a Democratic Party committee “wouldn’t be recognizing him as a qualified candidate” and denied him “participation in candidate forums alongside his four opponents.” *See* PDEC Case Complaint, DN 134 Tab 4 ¶ 42; PDEC Case First Amended Complaint, DN 134 Tab 5 ¶ 22. Consequently, the Democratic Party’s official debate announcement listed only four candidates, and not Plaintiff. *See* “July 13th Congressional District 13 Democratic Candidate Primary Debate,” DN 134 Tab 10. These facts explain why Plaintiff was not mentioned in the Debate Article. The newspaper “did not intentionally omit Liccione,” and when he complained the author of the article and the newspaper apologized for not mentioning him. 3AC ¶ 38 & Exhibit K. When Plaintiff later ran for another office, the newspaper conducted and “prominently displayed”

an online survey that included Plaintiff. 2AC ¶ 39. As a matter of law, therefore, Plaintiff is unable to plead clear and convincing evidence of actual malice.

B. The Debate Article is protected by the neutral report privilege.

The Third Amended Complaint also is barred by the neutral report privilege. “Under Florida law, it is well settled that disinterested communications of matters of public concern are privileged, even if defamatory.” *Barbuto v. Miami Herald Media Co.*, No. 21-CV-20608, 2022 WL 123906, at *6 (S.D. Fla. Jan. 13, 2022) (quoting *Corsi v. Newsmax Media, Inc.*, 519 F. Supp. 3d 1110, 1124 (S.D. Fla. 2021)). So, for example, a statement in a *Washington Post* article repeating another publication’s report of a money-laundering investigation was not actionable. *Trump Media & Tech. Grp. Corp. v. WP Co. LLC*, 720 F. Supp. 3d 1203, 1212-13 (M.D. Fla. 2024). Because that statement was “newsworthy” and “touch[ed] on an area of public interest,” that statement “fit squarely within the type of reporting to which the neutral reporting privilege has been applied.” *Id.* at 1213. Similarly, in this case, Defendants are accused of being the editor and owner of a newspaper that published a neutral, disinterested report on a matter of public concern – namely, an upcoming primary debate. The article did not mention Plaintiff, but instead presented neutral profiles of the debate participants, tracking the Democratic Party’s news release. The article, therefore, was privileged.

C. An election loss is not actionable.

Finally, the Third Amended Complaint fails because “[d]amages for a lost election are considered ‘too speculative and conjectural’ and thus cannot be awarded by a court.” *Peer v. Lewis*, No. 06-60146-CIV, 2008 WL 2047978, at *10 (S.D. Fla. May 13, 2008), *aff’d*, No. 08-13465, 2009 WL 323104 (11th Cir. Feb. 10, 2009).⁴ This election-related lawsuit is particularly

⁴ See also *Grayson v. No Labels, Inc.*, 601 F. Supp. 3d 1251, 1258 (M.D. Fla. 2022) (rejecting expert testimony attributing plaintiff’s election loss to negative political ads, despite pre-election poll suggesting voters supported plaintiff).

speculative, because Plaintiff attributes his election losses not only to the Defendants, but also to the Governor of Florida, the Florida Secretary of State, the Pinellas County Supervisor of Elections, the supervisor's general counsel, the Palm Beach County Supervisor of Elections, an election software company's chief executive, ten John and Jane Doe defendants, the Pinellas Democratic Executive Committee, the committee chair and secretary, the Florida Democratic Party, and other, larger media that did not mention his candidacy.⁵ Because Plaintiff blames so many other people for his election defeats, his attempt to impose liability on Defendants for his losses – including an election in which he received less than four percent of the vote⁶ – is far too speculative to state a defamation claim.

IV. Dismissal with prejudice is warranted or, at a minimum, a stay.

The Third Amended Complaint is Plaintiff's *eighth* attempt to state a cause of action regarding his election losses. Plaintiff has peddled his conspiracy theories long enough. Allowing this litigation to continue would inflict “precisely the harm that the Anti-SLAPP statute seeks to prevent – unnecessary litigation.” *Gundel*, 264 So. 3d at 311. “It is the intent of the Legislature that such lawsuits be expeditiously disposed of by the courts.” § 768.295(1), Fla. Stat. (2024). This case, therefore, should be dismissed with prejudice.

⁵ See *Liccione v. VR Sys. Inc.*, Case No. 1:25-CV-01028-APM, page 2 (D.D.C. Oct. 3, 2025) (Plaintiff sued “numerous federal, state, local, and foreign government officials,” alleging “a conspiracy beginning when falsified ballot records tainted multiple elections in which he ran as a candidate”) (copy attached as Exhibit B); Verified First Amended Complaint, *Liccione v. Marcus*, Case No. 8:24-cv-02005-SDM-NHA (M.D. Fla. 2024), DN 134 Tab 1, ¶¶ 6-14, 64-66, 70-72 & 79-81 (accusing various defendants of “directly causing his loss” in congressional primary and of actions “directly resulting in Plaintiff’s defeat”); PDEC Case Complaint, DN 134 Tab 4 ¶¶ 4-7 & 39-40 (alleging that articles in another newspaper “caused catastrophic damage to his campaign, his reputation, and his ability to raise campaign funds”); PDEC Case First Amended Complaint, DN 134 Tab 5 ¶¶ 51 & 67 (accusing “four mainstream media outlets” of “outright excluding Plaintiff from even being mentioned as a candidate,” and blaming PDEC defendants for “the loss of his Congressional primary race”).

⁶ See PDEC Case First Amended Complaint, DN 134 Tab 5 ¶ 20 (“Plaintiff lost the primary election, garnering only 3.93 percent of the vote, whereas Whitney Fox won with 57.94 percent of the vote.”).

In the meantime, and to the extent the Court takes this matter under advisement, Defendants request a stay of this matter pending a ruling by this Court or on appeal. *See In re Amendments to Florida Rule of Appellate Procedure 9.130*, 406 So. 3d 937, 938 (Fla. 2025) (providing for interlocutory review by appeal of nonfinal orders that deny Anti-SLAPP motion); *Bank of America, N.A. v. De Morales*, 314 So. 3d 528, 530-31 (Fla. 3d DCA 2020) (“postponing discovery for a short period of time pending determination of material, outstanding motions is within the discretion of the trial court,” but “[g]iven the purpose of the immunity asserted, the potentially dispositive nature of the motion, and the circumstances, the trial court abused its discretion in failing to stay discovery until it ruled on the bank’s motion to dismiss”).

A stay also is warranted (if necessary) pursuant to the recently amended Florida Vexatious Litigant Law, Section 68.093, Fla. Stat. (2025), which applies to a litigant who “repeatedly files unmeritorious pleadings, requests for relief, or other documents... or engages in other tactics that are frivolous or solely intended to cause unnecessary delay in any action.” *Id.* § 68.093(2)(c)(4). Plaintiff’s vexatiousness is apparent from the record in this case – repeating in the Third Amended Complaint a claim this Court previously rejected – and from decisions in related litigation. *See Liccione v. VR Sys. Inc.*, Case No. 1:25-CV-01028-APM, page 1 (finding Plaintiff’s election related claims “patently frivolous”) (copy attached as Exhibit B); *Liccione v. Marcus*, Case No. 8:24-cv-02005-SDM-NHA, Dkt. No. 132 pages 4-5 (M.D. Fla. Aug. 20, 2025) (denying “meritless” motions for preliminary injunction and to disqualify counsel and dismissing claims concerning primary election) (copy attached as Exhibit C). This record demonstrates that Plaintiff “is a vexatious litigant and is not reasonably likely to prevail on the merits” of this litigation. *Id.* § 68.093(3)(a). Accordingly, and absent a prompt dismissal with prejudice, Plaintiff should be required to furnish security. *Id.* § 68.093(3)(b). In the meantime, this action should be stayed. *Id.* § 68.093(3)(d). In any event, the Court should retain jurisdiction to determine the amount of fees

and costs to be awarded to Defendants pursuant to this Court's October 14 Order and for responding to the Third Amended Complaint. *Id.* § 768.295(4).

Conclusion

The Third Amended Complaint – like its predecessors – fails to state a cause of action and is without merit. The Anti-SLAPP law requires a prompt dismissal with prejudice, and that Plaintiff pays Defendants' attorneys' fees. In the alternative, and at a minimum, this case should be stayed.

Respectfully submitted,

THOMAS & LOCICERO PL

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and Thursday Morning Media, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on Nov. 18, 2025, the foregoing document was electronically filed with the Clerk of the Court via the E-Portal, and was served this same day on all parties and attorneys of record, either via transmission of Notices of Electronic Filing generated by the E-Portal or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

/s/ James B. Lake

Attorney

**IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION**

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

CATHY SALUSTRI LOPER, *et al.*,

Defendants.

_____ /

EXHIBIT A

to

**DEFENDANTS' MOTION TO DISMISS THIRD AMENDED COMPLAINT AND
FOR STAY OF VEXATIOUS LITIGATION**

PRIMARY ELECTION



Official Results

Includes Mail Ballots

Includes Early Voting

Includes Provisional Ballots



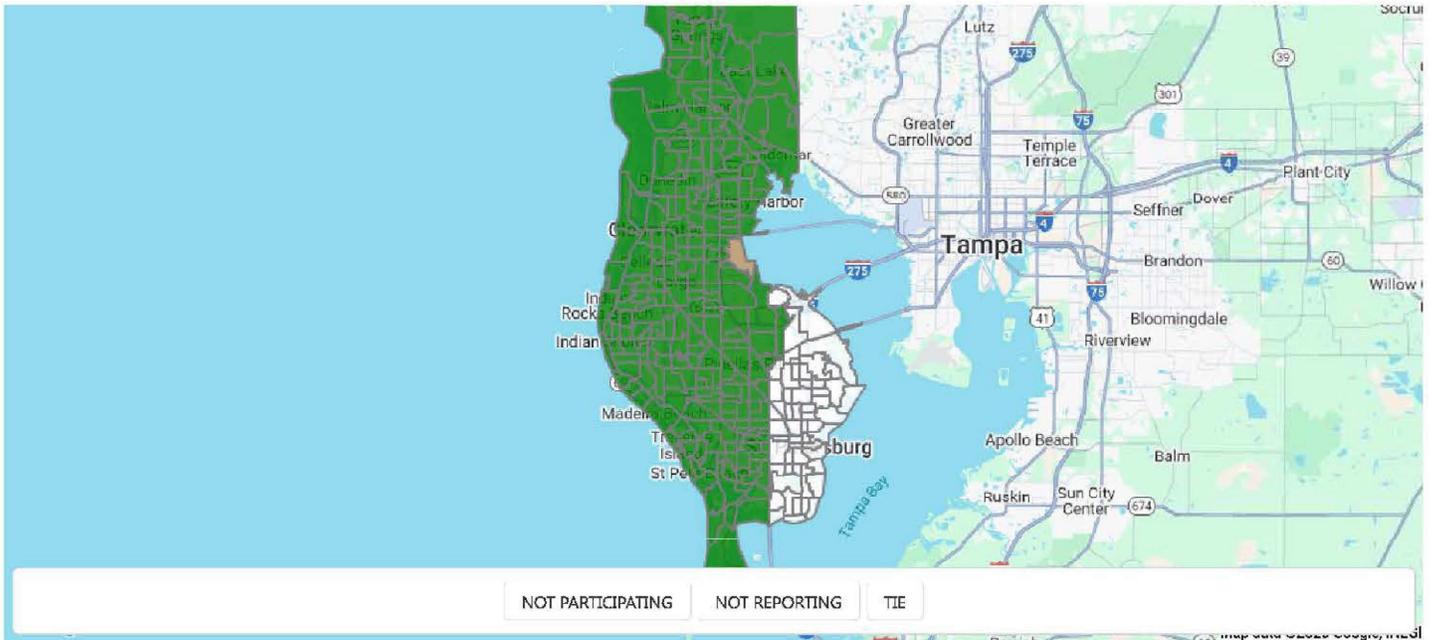
DEM REPRESENTATIVE IN CONGRESS - DISTRICT 13

(VOTE FOR: 1)

Last updated

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📅 Friday, August 23, 2024, 12:36:19 PM (1 year ago)



229/229

Precincts Reporting

Results

Vote types

Party / Candidate	Votes
DEM Sabrina Bousbar	8,929 17.43%
DEM Liz Dahan	6,904 13.48%
DEM Whitney Fox	29,678 57.94%
DEM John William Liccione	2,013 3.93%
DEM Mark Weinkrantz	3,697 7.22%

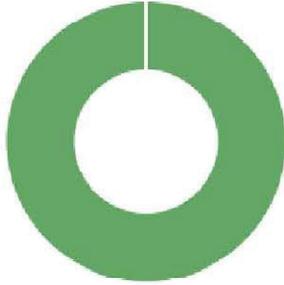
Vote Cast

51,221

← Previous Contest:
DEM United States Senator

Next Contest: →
DEM Precinct Committeeman - Precinct 142

PRECINCTS REPORTING



PRECINCTS REPORTING 286/286

VOTER TURNOUT

TOTAL	26.85%
Ballots Cast	168,294
Registered Voters	626,705

REPORTS

- Summary CSV**
Comma separated file showing total votes received. 
- Detail XLS**
Precinct level details for election results. Contains votes received by choice in each contest for all participating precincts. 
- Detail XML**
Precinct level details for election results. Contains votes received by choice in each contest for all participating precincts. 
- Detail TXT**
Precinct level details for election results. Contains votes received by choice in each contest for all participating precincts. 

**IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION**

JOHN WILLIAM LICCIONE,

Plaintiff,

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Case No.: 24-003939-CI

CATHY SALUSTRI LOPER, *et al.*,

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EXHIBIT B

to

**DEFENDANTS' MOTION TO DISMISS THIRD AMENDED COMPLAINT AND
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(internal quotation marks omitted). In such cases, a district court may dismiss the case *sua sponte*. See *Lewis v. Bayh*, 577 F. Supp. 2d 47, 54 (D.D.C. 2008).

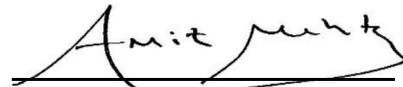
Here, Plaintiff alleges a conspiracy beginning when falsified ballot records tainted multiple elections in which he ran as a candidate. Am. Compl. ¶¶ 59, 81. Despite repeated attempts to get local, state, and federal officials to investigate, Plaintiff received no response. *Id.* ¶¶ 73–80, 85, 99. Plaintiff also filed election-fraud lawsuits, but several federal-government Defendants allegedly bribed a potential witness into silence by offering him a job within the Department of Justice’s Civil Rights Division. *Id.* ¶ 94. When Plaintiff spoke out against both the fraudulent election activity and various political officials more broadly, he received anonymous emails telling him that he may be detained, deported, or “[p]erhaps worse” by the new administration and that “[his] name is on The List.” *Id.* ¶¶ 63, 115. Plaintiff also received intelligence “from sources referred to herein collectively as ‘Radio Putin’ indicating that Putin and Trump are conspiring” to have a terrorist assassinate him. *Id.* ¶ 122. The same intelligence told Plaintiff that the National Security Administration had hacked his devices and that Russian officials had obtained some of the files. *Id.* ¶ 123. The President was then allegedly caught on a hot microphone mentioning Plaintiff by name, saying that he sees Plaintiff “getting a funeral.” *Id.* ¶ 125. Ultimately, Plaintiff alleges that Defendants violated a host of federal laws as they conspired to conceal the falsified ballot records and then silence Plaintiff through retaliation. *Id.* ¶ 129. Plaintiff seeks compensatory damages of over \$50 million and punitive damages of over \$200 million, along with other statutory damages and injunctive relief. *Id.* at pp. 73–75.

The court is mindful that complaints filed by pro se litigants are held to less stringent standards than those applied to formal pleadings drafted by lawyers. See *Haines v. Kerner*, 404 U.S. 519, 520 (1972). But Plaintiff’s claim is clearly fantastic, delusional, and “essentially

fictitious.” *Best*, 39 F.3d at 330 (internal quotation marks omitted). Accordingly, the court dismisses the Complaint and this action for lack of subject matter jurisdiction.

A separate final, appealable order accompanies this Memorandum Opinion.

Dated: October 3, 2025


Amit P. Mehta
United States District Judge

**IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION**

JOHN WILLIAM LICCIONE,

Plaintiff,

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Case No.: 24-003939-CI

CATHY SALUSTRI LOPER, *et al.*,

Defendants.

EXHIBIT C

to

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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

CASE NO. 8:24-cv-2005-SDM-NHA

JULIE MARCUS, et al.,

Defendants.

ORDER

John William Liccione, as a “voter” and as a “candidate,” sues (Doc. 55) seven defendants, including some elected Florida officials, and alleges “systemic election fraud, foreign interference, election software and systems hacking, evidence tampering, and subsequent cover-up and obstructive efforts orchestrated by state and county officials, private entities, and others.” According to the complaint, Liccione is a voter registered in Pinellas County, Florida and a “Democratic candidate in the 2024 election for U.S. Representative for Florida’s 13th Congressional District.” Otherwise difficult to understand, the complaint includes inflammatory and accusatory but not coherent or cogent allegations.

A June 27, 2025 order (Doc. 116) states:

Five motions (Docs. 59, 67, 71, 80, and 81) to dismiss the current complaint pend. The plaintiff responds (Docs. 61, 93) to two of the five pending motions. No later than July 10, 2025, the plaintiff must either respond to each remaining motion or move to amend the complaint.

If the plaintiff fails to comply with this order, each motion to dismiss will be deemed unopposed.

The docket reveals no response to the remaining three motions (Docs. 67, 71, and 80) to dismiss. Accordingly, the three motions are deemed unopposed.

Rule 8(a)(2), Federal Rules of Civil Procedure, requires that a pleading contain “a short and plain statement of the claim showing that the pleader is entitled to relief.” A satisfactory complaint will support with identified facts each legal assertion. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). Rule 8 requires that a complaint “give the defendant fair notice of what the . . . claim is and the grounds upon which it rests.” *Erickson v. Pardus*, 551 U.S. 89, 93 (2007) (quoting *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555 (2007)).

The complaint fails to give adequate notice of both the claims against each defendant and the “grounds upon which [each claim] rests.” The complaint fails to identify specific constitutional violations and instead asserts general, conclusory violations of “the right to a fair election and equal protection under the law.” The complaint fails to explain which facts support each claim, and each count incorporates “all preceding paragraphs.” For example, the final count, Count X, incorporates the preceding nine counts and the preceding sixty-three paragraphs of scattered “factual” allegations. The complaint repeatedly includes seemingly irrelevant facts, which increase the confusion. Also, the complaint includes many conclusory and scattered allegations of fraud, interference, and corruption. Because the complaint leaves each

defendant unable to comprehend, to assess, and to defend each claim, the complaint fails to state a claim.

Because Count II asserts a violation of 52 U.S.C. § 20511, which is a “criminal penalty” statute that creates no private right of action, Count II is facially invalid and incapable of salvage by mere amendment. Count II is **DISMISSED WITH PREJUDICE**.

Count IV asserts a violation of Section 119.01, Florida Statutes, which creates no private right of action. Under Section 119.10, a violation of any provision in Chapter 119 warrants a noncriminal infraction, impeachment, a misdemeanor, or a felony, but Section 119.10 permits no private prosecution of any violation. Because amending the count is futile, Count IV is **DISMISSED WITH PREJUDICE**.

Count V asserts a claim for fraudulent concealment and Count X asserts a claim for fraudulent misrepresentation. Each claim requires that a “defendant knew [that the] concealment of or [the] failure to disclose the material fact would induce the plaintiff to act” and that Liccione “detrimentally relied on the concealed information.” *Philip Morris USA Inc. v. Principe*, 337 So. 3d 821, 827 n.7 (Fla. 3rd DCA 2021). The complaint fails to identify the act induced by the alleged concealment, fails to allege that any defendant knew that the alleged concealment would induce an act, and fails to allege detrimental reliance.

Count VI asserts a violation of 18 U.S.C. § 1030, which creates a private right of action “only if the conduct involves 1 of the factors set forth in subclauses (I), (II),

(III), (IV), or (V) of subsection (c)(4)(A)(i).” The complaint fails to identify, or even suggest, which “subclause” is “involved” in the alleged violation.

Count VII asserts a violation of the Racketeer Influenced and Corrupt Organizations Act. 18 U.S.C. § 1964(c) creates a claim for relief if a person’s business or a person’s property suffers an injury “by reason of violation of” 18 U.S.C. § 1962. The complaint fails to allege an injury to Liccione’s “business” or “property.” Also, the complaint fails to allege a violation of Section 1962, which is a complex statute incapable of invocation by mere conclusory and disjointed allegations.

Count VIII asserts a violation of 18 U.S.C. § 1503, which criminalizes a “corrupt” “endeavor to influence, intimidate, or impede any grand or petit juror, or officer in or of any court of the United States.” Because Section 1503 is a criminal statute and creates no private right of action, Count VIII is **DISMISSED WITH PREJUDICE**.

For the reasons above, each motion (Docs. 59, 67, 71, 80, and 81) to dismiss is **GRANTED**. As mentioned, Count II, Count IV, and Count VIII are **DISMISSED WITH PREJUDICE**. The balance of the complaint is **DISMISSED WITHOUT PREJUDICE**. No later than **SEPTEMBER 12, 2025**, the plaintiff may amend the complaint to correct the deficiencies identified in this order or in each motion to dismiss. If Liccione fails to timely amend, this order becomes final. In other words, the action will end without another opportunity to amend the complaint. The “emergency” motion (Doc. 127) for a preliminary injunction is **DENIED** as meritless and for fundamentally misunderstanding the purpose and effect of a

preliminary injunction. The motion (Doc. 128) to “disqualify counsel” is **DENIED** as meritless. The motion (Doc. 121) to transfer the action is **DENIED** for the reasons stated in each response (Docs. 124, 125, and 126).

In any amended complaint and in addition to resolving the deficiencies described earlier, (1) the plaintiff must plead his complaint in separate claims for relief and include no more than one claim for relief in each count of the amended complaint; (2) the plaintiff must state above each count in the form of a title or a heading the name of one and only one claim for relief that the count alleges and whether the claim is based on federal law or based on state law; (3) the plaintiff must separate or identify the facts that support each count from the facts that support another count or counts; (4) the plaintiff must in each count identify the defendant or defendants against whom that count states a claim; and (5) the plaintiff must in each claim state the relief to which, based on the claim, the plaintiff claims entitlement.

A CAUTION TO THE PLAINTIFF

Litigation in federal court is difficult and requires timely compliance with applicable rules, including the Federal Rules of Civil Procedure, the Local Rules, the Federal Rules of Evidence, and several procedural, discovery, and other orders. An action against the State of Florida, against Florida’s political subdivisions, or against Florida’s constitutional and other officers presents special requirements. A judge cannot assist a party, even a *pro se* party, in conducting an action. Therefore, the plaintiff is strongly advised to obtain legal advice and assistance — preferably full representation — from a member of The Florida Bar. To the extent he intends to

continue to represent himself in this action, the plaintiff should familiarize himself with both the Federal Rules of Civil Procedure at <https://www.uscourts.gov/rules-policies/current-rules-practice-procedure/federal-rules-civil-procedure> and the Local Rules for the Middle District of Florida at <https://www.flmd.uscourts.gov/local-rules>, a copy of each of which is available in the clerk's office on the second floor of the Sam M. Gibbons United States Courthouse, 801 North Florida Avenue, Tampa, Florida. Also, the plaintiff can consult the "Litigants Without Lawyers" guide at <http://www.flmd.uscourts.gov/litigants-without-lawyers>.

ORDERED in Tampa, Florida, on August 20, 2025.



STEVEN D. MERRYDAY
UNITED STATES DISTRICT JUDGE

cc by e-mail: jliccione@protonmail.com

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CLOSED

U.S. District Court
Middle District of Florida (Tampa)
CIVIL DOCKET FOR CASE #: 8:24-cv-02005-SDM-NHA

Liccione v. Marcus, et al
Assigned to: Judge Steven D. Merryday
Referred to: Magistrate Judge Natalie Hirt Adams
Demand: \$9,999,000
Cause: 42:1983 Civil Rights Act

Date Filed: 08/23/2024
Date Terminated: 09/19/2025
Jury Demand: Plaintiff
Nature of Suit: 441 Civil Rights: Voting
Jurisdiction: Federal Question

Plaintiff**John William Liccione**

represented by **John William Liccione**
6800 Gulfport Blvd. S. Ste 201-116
South Pasadena, FL 33707
443-698-8156
PRO SE

V.

Defendant**Julie Marcus**

*In her official capacity as Pinellas County
Supervisor of Elections*

represented by **Andrew Keefe**
Pinellas County Attorney's Office
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant**Justin Chase**

*Official capacity as Deputy Supervisor of
Elections*
TERMINATED: 12/04/2024

represented by **Andrew Keefe**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant**Jennifer Griffith**

*Official capacity as Chair of the Pinellas
Democratic Executive Committee*
TERMINATED: 12/04/2024

represented by **George Albert Doyle Thurlow**
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535 Central Avenue
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant**Nikki Fried**

*Official capacity as Chair of the Florida
Democratic Party
TERMINATED: 10/25/2024*

represented by **Mark Herron**

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ATTORNEY TO BE NOTICED

Defendant**Whitney Fox**

*Individual and Official Capacity as a
Democratic Candidate for Florida's 13th
Congressional District
TERMINATED: 12/04/2024*

represented by **Ryan D. Barack**

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*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Defendant**Mark Weinkrantz**

*Individual and Official Capacity as a
Democratic candidate for Florida's 13th
Congressional District
TERMINATED: 12/04/2024*

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ATTORNEY TO BE NOTICED

Defendant**Jane Doe 1**

in her personal and professional capacities

Defendant**John/Jane Does**

*in their official and individual capacities,
including unknown Russian hackers who
compromised election system software and
the production information systems of VR
Systems and their software development
environment*

Defendant**Andrew Darlington**

*In his official capacity as Director of the
Florida Election Crimes and Security*

represented by **William H. Stafford**

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ATTORNEY TO BE NOTICED

Defendant

Governor Ron DeSantis
In his official capacity as Governor of Florida

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ATTORNEY TO BE NOTICED

Maryssa Hardy
(See above for address)
ATTORNEY TO BE NOTICED

Defendant

Cory Byrd
In his official capacity as Florida Secretary of State

represented by **William H. Stafford**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Ashley E. Davis
(See above for address)
ATTORNEY TO BE NOTICED

Joseph Van de Bogart
(See above for address)
TERMINATED: 05/09/2025
ATTORNEY TO BE NOTICED

Maryssa Hardy
(See above for address)
ATTORNEY TO BE NOTICED

Defendant

Matt Smith
*In his official capacity as General Counsel
for the Pinellas County Supervisor of
Elections*

represented by **Andrew Keefe**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Mindy Perkins
*In her professional capacity as Chief
Executive Officer of VR Systems*

represented by **Benjamin John Gibson**
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ATTORNEY TO BE NOTICED

Defendant

Wendy Link
*In her official capacity as Palm Beach
County Supervisor of Elections*

represented by **Gregor J. Schwinghammer, Jr.**
Gunster, Yoakley & Stewart, P.A.
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ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
08/23/2024	1	COMPLAINT for EMERGENCY INJUNCTIVE RELIEF AND DAMAGES against Justin Chase, Jane Doe 1-10, John Doe 1-10, Whitney Fox, Nikki Fried, Jennifer Griffith, Julie Marcus, Mark Weinkrantz with Jury Demand Filing fee \$405.00, receipt number TPA70943 filed by John William Liccione. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Civil Cover Sheet)(AA) (Entered: 08/23/2024)
08/23/2024	2	SUMMONS issued as to Justin Chase, Whitney Fox, Nikki Fried, Jennifer Griffith, Julie Marcus, Mark Weinkrantz. (AA) (Entered: 08/23/2024)
08/23/2024	3	MOTION for Miscellaneous Relief, specifically Move case from FL 6th Circuit Court by John William Liccione. (AA) (Entered: 08/23/2024)
08/23/2024	4	MOTION for Miscellaneous Relief, specifically to Order the US Federal Marshalls to enter John Liccione into the Federal Witness Protection Program by John William Liccione. (AA) (Entered: 08/23/2024)
08/23/2024	5	MOTION for Miscellaneous Relief, specifically to Order Federal Marshalls to Accompany Plaintiff to Pinellas County Supervisor of Elections Office in Largo and to Serve Summons/Lawsuit on all Defendants by John William Liccione. (AA) (Entered: 08/23/2024)
08/23/2024	6	MOTION for Miscellaneous Relief, specifically to Empanel a Special Grand Jury by John William Liccione. (AA) (Entered: 08/23/2024)
08/26/2024	7	ORDER denying the motion for a temporary restraining order; denying 3, 4, 5, 6. Signed by Judge Steven D. Merryday on 8/26/2024. (AP) (Entered: 08/26/2024)
09/03/2024	8	NOTICE of Order Referring Case to U.S. Magistrate Judge for IDEAL Program. See attached Order for important deadlines and information about the IDEAL Program. (CDR) (Entered: 09/03/2024)
09/13/2024	9	NOTICE of Appearance by George Albert Doyle Thurlow on behalf of Jennifer Griffith (Thurlow, George) (Entered: 09/13/2024)
09/13/2024	10	NOTICE of a related action per Local Rule 1.07(c) by Jennifer Griffith. Related case(s): Yes (Thurlow, George) (Entered: 09/13/2024)
09/13/2024	12	MOTION for Miscellaneous Relief, specifically E-Filing Privilege by John William Liccione. (AA) (Entered: 09/17/2024)
09/16/2024	11	MOTION to Dismiss for Lack of Jurisdiction , MOTION to Dismiss Case as Frivolous , MOTION to Dismiss for Failure to State a Claim by Jennifer Griffith. (Thurlow, George) (Entered: 09/16/2024)
09/17/2024	13	NOTICE of APPEARANCE AND DESIGNATION OF LEAD COUNSEL Appearance by Andrew Keefe on behalf of Justin Chase, Julie Marcus (Keefe, Andrew). (Entered: 09/17/2024)

09/17/2024	14	MOTION to Dismiss PLAINTIFF'S COMPLAINT by Justin Chase, Julie Marcus. (Keefe, Andrew) (Entered: 09/17/2024)
09/17/2024	15	DISCLOSURE STATEMENT under Rule 7.1, Federal Rules of Civil Procedure, and Local Rule 3.03 by Justin Chase, Julie Marcus. (Keefe, Andrew) (Entered: 09/17/2024)
09/18/2024	16	NOTICE of Appearance by Mark Herron on behalf of Nikki Fried (Herron, Mark) (Entered: 09/18/2024)
09/18/2024	17	NOTICE of a related action per Local Rule 1.07(c) by Nikki Fried. Related case(s): Yes (Herron, Mark) (Entered: 09/18/2024)
09/18/2024	18	DISCLOSURE STATEMENT under Rule 7.1, Federal Rules of Civil Procedure, and Local Rule 3.03 by Nikki Fried. (Herron, Mark) (Entered: 09/18/2024)
09/18/2024	19	MOTION to Dismiss Complaint for Emergency Injunctive Relief by Nikki Fried. (Herron, Mark). (Entered: 09/18/2024)
09/18/2024	20	ENDORSED ORDER: The plaintiff's motion (Doc. 12) for access to file documents on CM/ECF is DENIED. The plaintiff can mail or hand deliver any document to the clerk's office, or the plaintiff can electronically submit through the Electronic Document Submission Portal any document. Signed by Judge Steven D. Merryday on 9/18/2024. (AP) Modified on 9/19/2024 as to docket number (ARL). (Entered: 09/18/2024)
09/18/2024	21	MOTION for Case Management Conference by John William Liccione. (AA) (e-portal) (Entered: 09/19/2024)
09/19/2024	22	SUPPLEMENT re 14 MOTION to Dismiss PLAINTIFF'S COMPLAINT by Justin Chase, Julie Marcus. (Keefe, Andrew) (Entered: 09/19/2024)
09/19/2024	23	NOTICE of a related action per Local Rule 1.07(c) by Justin Chase, Julie Marcus. Related case(s): Yes (Keefe, Andrew) (Entered: 09/19/2024)
09/27/2024	24	MOTION for Extension of Time to File Answer re 1 Complaint or to file Motion to Dismiss by Whitney Fox. (Barack, Ryan) Modified on 9/27/2024 as to docket text (ARL). (Entered: 09/27/2024)
09/29/2024	25	NOTICE by Jennifer Griffith <i>Notice of Unavailability</i> (Thurlow, George) (Entered: 09/29/2024)
09/29/2024	26	DISCLOSURE STATEMENT under Rule 7.1, Federal Rules of Civil Procedure, and Local Rule 3.03 by Jennifer Griffith. (Thurlow, George) (Entered: 09/29/2024)
09/30/2024	27	ENDORSED ORDER: Whitney Fox moves (Doc. 24) to extend the time within which to respond to the complaint. The motion is GRANTED. No later than October 18, 2024, Fox may respond to the complaint. Signed by Judge Steven D. Merryday on 9/30/2024. (AP) (Entered: 09/30/2024)
10/02/2024	28	ENDORSED ORDER granting 21 Motion for IDEAL Case Management Conference. The Court will hold a Case Management Conference on October 10, 2024 at 3:00 PM in Courtroom 11A of the Sam Gibbons Courthouse at 801 N Florida Ave, Tampa, FL 33602. At the Conference, the Court will discuss the IDEAL Program Policies (Doc. 8) and the parties' scheduling and case management needs. Signed by Magistrate Judge Natalie Hirt Adams on 10/2/2024. (CJF) (Entered: 10/02/2024)

10/02/2024	29	NOTICE of hearing: IDEAL Case Management Conference set for 10/10/2024 at 03:00 PM in Tampa Courtroom 11 A before Magistrate Judge Natalie Hirt Adams. (CJF) (Entered: 10/02/2024)
10/07/2024	30	NOTICE of voluntary dismissal by Whitney Fox (Barack, Ryan) (Entered: 10/07/2024)
10/07/2024	31	NOTICE OF RESCHEDULING HEARING: The Case Management Conference hearing previously scheduled for 10/10/2024 is rescheduled due to inclement weather. New scheduling date and time: Case Management Conference set for 10/30/2024 at 03:00 PM in Tampa Courtroom 11 A before Magistrate Judge Natalie Hirt Adams. (CDR) (Entered: 10/07/2024)
10/07/2024	32	NOTICE of voluntary dismissal with prejudice by John William Liccione (eportal).(LF) (Entered: 10/14/2024)
10/16/2024	33	ENDORSED ORDER: In accord with the plaintiff's notice (Doc. 32), the action against Whitney Fox is DISMISSED WITH PREJUDICE. Signed by Judge Steven D. Merryday on 10/16/2024. (AP) (Entered: 10/16/2024)
10/22/2024	34	MOTION to Dismiss Defendant Nikki Fried by John William Liccione. (AA) (e-portal) (Entered: 10/22/2024)
10/24/2024	35	ENDORSED ORDER: The plaintiff moves (Doc. 34) to dismiss the action against Nikki Fried. The motion is GRANTED. The action against Fried is DISMISSED WITH PREJUDICE. Fried's motion (Doc. 19) to dismiss is DENIED AS MOOT. Signed by Judge Steven D. Merryday on 10/24/2024. (AP) (Entered: 10/24/2024)
10/30/2024	36	ORAL MOTION for Miscellaneous Relief, specifically to Extend Response Deadline by John William Liccione. (CDR) (Entered: 10/31/2024)
10/30/2024	37	Minute Entry. In Person Proceedings held before Magistrate Judge Natalie Hirt Adams: granting 36 Motion Extend Response Deadline; CASE MANAGEMENT CONFERENCE held on 10/30/2024. (DIGITAL) (CDR) (Entered: 10/31/2024)
11/06/2024	38	Joint MOTION for Extension of Time to File Case Management Report 12/15/24 by John William Liccione. (e-portal) (JKB) (Entered: 11/07/2024)
11/07/2024	39	ENDORSED ORDER: The parties move (Doc. 38) to extend the time within which to file a case management report. The motion is GRANTED-IN-PART. No later than November 21, 2024, the parties must submit a case management report. Signed by Judge Steven D. Merryday on 11/7/2024. (AP) (Entered: 11/07/2024)
11/12/2024	40	First MOTION for Extension of Time to File Answer <i>or motion to dismiss</i> by Mark Weinkrantz. (McGuire, Thomas) (Entered: 11/12/2024)
11/12/2024	41	NOTICE of Appearance by Thomas E. McGuire on behalf of Mark Weinkrantz (McGuire, Thomas) (Entered: 11/12/2024)
11/14/2024	42	ENDORSED ORDER: Mark Weinkrantz moves (Doc. 40) to extend the time within which to respond to the complaint. The motion, filed in twelve-point Times New Roman, violates Local Rule 1.08(b), which requires at least fourteen-point Times New Roman. The motion (Doc. 40) is DENIED WITHOUT PREJUDICE. No later than NOVEMBER 21, 2024, Weinkrantz may file a motion that conforms to Local Rule 1.08. Signed by Judge Steven D. Merryday on 11/14/2024. (DJL) (Entered: 11/14/2024)
11/15/2024	43	Amended MOTION for Extension of Time to File Answer <i>or motion to dismiss</i> by Mark Weinkrantz. (McGuire, Thomas) (Entered: 11/15/2024)

11/20/2024	44	NOTICE of "Extortive Death Threat" by John William Liccione. (Attachments: # 1 Exhibit, # 2 Affidavit) (e-portal) (JKB) (Entered: 11/20/2024)
11/20/2024	45	MOTION to Stay Discovery <i>Pending Resolution of Motions to Dismiss and Incorporated Memorandum of Law</i> by Justin Chase, Julie Marcus. (Keefe, Andrew) Motions referred to Magistrate Judge Natalie Hirt Adams. (Entered: 11/20/2024)
11/20/2024	46	Amended MOTION for Extension of Time to File Answer <i>or motion to dismiss</i> by Mark Weinkrantz. (McGuire, Thomas) (Entered: 11/20/2024)
11/20/2024	47	RESPONSE in Opposition re 45 MOTION to Stay Discovery <i>Pending Resolution of Motions to Dismiss and Incorporated Memorandum of Law</i> filed by John William Liccione. (Attachments: # 1 Exhibit A, # 2 Affidavit)(AA) (e-portal) (Entered: 11/21/2024)
11/20/2024	48	MOTION for Leave to file First Amended 1 Complaint, by John William Liccione. (e-portal) (JKB) (Entered: 11/21/2024)
11/21/2024	49	UNILATERAL CASE MANAGEMENT REPORT. (Keefe, Andrew) (Entered: 11/21/2024)
11/22/2024	50	UNILATERAL CASE MANAGEMENT REPORT. (e-portal) (JKB) (Entered: 11/25/2024)
11/25/2024	51	ENDORSED ORDER: The plaintiff's motion (Doc. 48) to amend the complaint is GRANTED. No later than December 4, 2024, the plaintiff may amend the complaint. Any future filing must comply with each applicable rule, including Local Rule 3.01(g). Signed by Judge Steven D. Merryday on 11/25/2024. (AP) (Entered: 11/25/2024)
11/27/2024	52	NOTICE of voluntary dismissal by John William Liccione (AA) (e-portal) (Entered: 12/02/2024)
12/04/2024	53	VACATED per 57 Order- ENDORSED ORDER: In accord with the plaintiff's notice (Doc. 52), the action is DISMISSED WITH PREJUDICE. Each pending motion (Docs. 11, 14, 43, 45, and 46) is DENIED AS MOOT. The clerk must close the case. Signed by Judge Steven D. Merryday on 12/4/2024. (AP) Modified docket text on 12/9/2024 (JTM). (Entered: 12/04/2024)
12/04/2024	55	AMENDED COMPLAINT against Jane Doe 1-10, John Doe 1-10, Julie Marcus, Andrew Darlington, Ron DeSantis, Cory Byrd, Matt Smith, Mindy Perkins, Wendy Link with Jury Demand. Terminating Jennifer Griffith (Official capacity as Chair of the Pinellas Democratic Executive Committee), Mark Weinkrantz (Individual and Official Capacity as a Democratic candidate for Florida's 13th Congressional District), Justin Chase (Official capacity as Deputy Supervisor of Elections) and Whitney Fox (Individual and Official Capacity as a Democratic Candidate for Florida's 13th Congressional District) filed by John William Liccione. Related document: 1 Complaint, filed by John William Liccione. (Attachments: # 1 Exhibit) (e-portal) (JKB) (Entered: 12/06/2024)
12/04/2024	56	SUMMONS issued as to Cory Byrd, Andrew Darlington, Ron DeSantis, Wendy Link, Mindy Perkins, Matt Smith. (e-portal) (JKB) (Entered: 12/06/2024)
12/05/2024	54	NOTICE of Local Rule 1.11(e), which provides that, unless an order states another time, a seal under Rule 1.11 expires ninety days after a case is closed and all appeals are exhausted. To prevent the content of a sealed item from appearing on the docket after the seal expires, a party or interested non-party must move for relief before the seal expires. (Signed by Deputy Clerk). (BD) (Entered: 12/05/2024)

12/06/2024	57	ORDER vacating 53--order dismissing the action; directing the clerk to re-open the case. Signed by Judge Steven D. Merryday on 12/6/2024. (AP) (Entered: 12/06/2024)
12/16/2024	58	Unopposed MOTION for Extension of Time to File Answer <i>to the First Amended Complaint and Incorporated Memorandum of Law</i> by Julie Marcus. (Keefe, Andrew) (Entered: 12/16/2024)
12/18/2024	59	MOTION to Dismiss First Amended Complaint by Julie Marcus. (Keefe, Andrew) (Entered: 12/18/2024)
12/19/2024	60	ENDORSED ORDER: Julie Marcus moves (Doc. 58) unopposed to extend the time within which Marcus may respond to the complaint. The motion is GRANTED. No later than January 3, 2025, Marcus may respond to the complaint. Signed by Judge Steven D. Merryday on 12/19/2024. (AP) (Entered: 12/19/2024)
01/08/2025	61	RESPONSE in Opposition re 59 MOTION to Dismiss First Amended Complaint filed by John William Liccione. (e-portal) (JKB) Modified text on 1/9/2025 (JKB). (Entered: 01/09/2025)
01/09/2025	62	MOTION for Extension of Time to File Answer re 55 Amended Complaint by Andrew Darlington, Cory Byrd. (Stafford, William) Modified docket text on 1/9/2025 (JOS). (Entered: 01/09/2025)
01/09/2025	63	Amended MOTION for Extension of Time to File Answer re 55 Amended Complaint by Andrew Darlington, Cory Byrd. (Stafford, William) Modified docket text on 1/9/2025 (JOS). (Entered: 01/09/2025)
01/09/2025	64	NOTICE of Appearance by Joseph Van de Bogart on behalf of Andrew Darlington, Cory Byrd (Van de Bogart, Joseph) (Entered: 01/09/2025)
01/09/2025	65	NOTICE of Appearance by Ashley E. Davis on behalf of Andrew Darlington, Cory Byrd (Davis, Ashley) (Entered: 01/09/2025)
01/09/2025	66	Amended MOTION for Extension of Time to File Answer re 55 Amended Complaint by Andrew Darlington, Cory Byrd. (Stafford, William) Modified docket text on 1/10/2025 (EVK). (Entered: 01/09/2025)
01/09/2025	67	MOTION to Dismiss Plaintiff's Claims Against Wendy Link, in her Capacity as Palm Beach County Supervisor of Elections by Wendy Link. (Schwinghammer, Gregor) (Entered: 01/09/2025)
01/10/2025	68	ENDORSED ORDER: Cord Byrd and Andrew Darlington's motion (Doc. 66) to extend the time within which to respond to the complaint is GRANTED. No later than February 8, 2025, Byrd and Darlington may respond to the complaint. Each earlier motion (Docs. 62 and 63) is DENIED AS MOOT. Signed by Judge Steven D. Merryday on 1/10/2025. (AP) (Entered: 01/10/2025)
01/10/2025	69	***ENTERED IN ERROR (Signed by Deputy Clerk). (EVK) Modified docket text on 1/10/2025 (EVK). (Entered: 01/10/2025)
01/16/2025	70	NOTICE of Appearance by Andrew Keefe on behalf of Matt Smith (Keefe, Andrew) (Entered: 01/16/2025)
01/16/2025	71	MOTION to Dismiss Plaintiff's First Amended Complaint with Incorporated Memorandum of Law by Matt Smith. (Keefe, Andrew) (Entered: 01/16/2025)
01/17/2025	72	NOTICE of Appearance by Benjamin John Gibson on behalf of Mindy Perkins (Gibson, Benjamin) (Entered: 01/17/2025)

01/17/2025	73	NOTICE of Appearance by Kassandra S. Reardon on behalf of Mindy Perkins (Reardon, Kassandra) (Entered: 01/17/2025)
01/17/2025	74	NOTICE of Appearance by Nicholas John Peter Meros on behalf of Mindy Perkins (Meros, Nicholas) (Entered: 01/17/2025)
01/17/2025	75	MOTION for Extension of Time to File Answer re 55 Amended Complaint by Mindy Perkins. (Gibson, Benjamin) Modified text on 1/21/2025 (ABM). (Entered: 01/17/2025)
01/17/2025	76	DISCLOSURE STATEMENT under Rule 7.1, Federal Rules of Civil Procedure, and Local Rule 3.03 by Mindy Perkins. (Gibson, Benjamin) (Entered: 01/17/2025)
01/21/2025	77	ENDORSED ORDER: Mindy Perkins moves (Doc. 75) to extend the time within which to respond to the complaint. The motion is GRANTED. No later than February 24, 2025, Perkins may respond to the complaint. Signed by Judge Steven D. Merryday on 1/21/2025. (AP) (Entered: 01/21/2025)
02/04/2025	78	NOTICE of Appearance by William H. Stafford on behalf of Ron DeSantis (Stafford, William) (Entered: 02/04/2025)
02/05/2025	79	NOTICE of Appearance by Maryssa Hardy on behalf of Andrew Darlington, Ron DeSantis, Cory Byrd. (Hardy, Maryssa) (Entered: 02/05/2025)
02/07/2025	80	MOTION to Dismiss First Amended Complaint by Andrew Darlington, Ron DeSantis, Cory Byrd. (Attachments: # 1 Exhibit Election Results)(Stafford, William) (Entered: 02/07/2025)
02/24/2025	81	MOTION to Dismiss Complaint and Incorporated Memorandum of Law by Mindy Perkins. (Gibson, Benjamin) (Entered: 02/24/2025)
03/03/2025	82	MOTION to Stay Discovery <i>And Incorporated Memorandum of Law</i> by Cory Byrd, Andrew Darlington, Ron DeSantis. (Hardy, Maryssa) Motions referred to Magistrate Judge Natalie Hirt Adams. (Entered: 03/03/2025)
03/06/2025	83	MOTION for leave to file Second Amended Complaint 55 by John William Liccione. (e-portal) (JKB) (Entered: 03/07/2025)
03/06/2025	84	EMERGENCY MOTION for Injunctive Relief to set Aside and Authenticate 411 Fraudulent Vote-by-Mail Ballots by John William Liccione. Chambers notified. (e-portal) (Attachments: # 1 Exhibit A) (JKB) (Entered: 03/07/2025)
03/07/2025	85	DISCLOSURE STATEMENT under Rule 7.1, Federal Rules of Civil Procedure, and Local Rule 3.03 by Cory Byrd, Andrew Darlington, Ron DeSantis. (Stafford, William) (Entered: 03/07/2025)
03/12/2025	86	MOTION for Extension of Time to File Response/Reply to <i>Plaintiff's Motion for Leave to file Second Amended Complaint</i> by Julie Marcus, Matt Smith. (Keefe, Andrew) (Entered: 03/12/2025)
03/12/2025	87	MOTION to Stay Discovery by Mindy Perkins. (Meros, Nicholas) Motions referred to Magistrate Judge Natalie Hirt Adams. (Entered: 03/12/2025)
03/12/2025	88	STRICKEN per 90 Order -NOTICE of <i>Rule 26 Initial Disclosures</i> by Mindy Perkins. (Meros, Nicholas) Modified text on 3/13/2025 (JK). Modified on 3/13/2025 (JK). (Entered: 03/12/2025)
03/13/2025	89	SUPPLEMENT re 86 MOTION for Extension of Time to File Response/Reply to <i>Plaintiff's Motion for Leave to file Second Amended Complaint</i> by Julie Marcus, Matt Smith. (Keefe, Andrew) (Entered: 03/13/2025)

03/13/2025	90	ENDORSED ORDER. The Clerk is directed to strike as improperly filed discovery 88 Defendant Perkins's Rule 26 Disclosures. Discovery documents should not be filed on the Court docket except as an attachment to a pending motion, when appropriate, or as directed by the Court. <i>See</i> Fed. R. Civ. P. 5(d)(1)(A) (" [D]isclosures under Rule 26(a)(1)...must not be filed until they are used in the proceeding or the court orders filing."). Signed by Magistrate Judge Natalie Hirt Adams on 3/13/2025. (CJF) (Entered: 03/13/2025)
03/13/2025	91	MOTION to Stay Discovery by Julie Marcus, Matt Smith. (Keefe, Andrew) Motions referred to Magistrate Judge Natalie Hirt Adams. (Entered: 03/13/2025)
03/14/2025	92	ENDORSED ORDER: Julie Marcus and Matt Smith move (Doc. 86) to extend the time within which to respond to the motion (Doc. 83) to amend the complaint. The motion (Doc. 86) is GRANTED. This order extends the time within which every defendant, including the non-moving defendants, may respond to the motion (Doc. 83) to amend the complaint. No later than April 8, 2024, each defendant may respond to the motion (Doc. 83). Signed by Judge Steven D. Merryday on 3/14/2025. (AP) (Entered: 03/14/2025)
03/17/2025	93	RESPONSE to Motion re 81 MOTION to Dismiss Complaint and Incorporated Memorandum of Law filed by John William Liccione. (Attachments: # 1 Exhibit, # 2 Affidavit)(AA) (Entered: 03/17/2025)
03/17/2025	94	MOTION for Extension of Time to File Response/Reply as to 84 MOTION for Miscellaneous Relief, specifically Injunctive Relief to set Aside and Authenticate 411 Fraudulent Vote-by-Mail Ballots by Julie Marcus, Matt Smith. (Keefe, Andrew) (Entered: 03/17/2025)
03/18/2025	95	MOTION for Miscellaneous Relief, specifically Automatic E-Service of All Court Docket Filings and Notices by John William Liccione. (e-portal) (JKB) (Entered: 03/18/2025)
03/19/2025	96	NOTICE of WITHDRAWAL of 84 Motion for Miscellaneous Relief, Specifically for Injunctive Relief filed by John William Liccione. (e-portal) (JKB) (Entered: 03/20/2025)
03/24/2025	97	ENDORSED ORDER: Because the plaintiff withdraws (Doc. 96) a motion (Doc. 84) for a preliminary injunction, the motion (Doc. 84) and the defendant's motion (Doc. 94) to extend the time within which to respond to the motion for a preliminary injunction are DENIED AS MOOT. Signed by Judge Steven D. Merryday on 3/24/2025. (AP) (Entered: 03/24/2025)
03/24/2025	98	MOTION to Proceed In Forma Pauperis Under Seal by John William Liccione. (e-portal) (Attachments: # 1 Motion to proceed In Forma Pauperis) (JKB) Modified event on 3/24/2025 (JKB). (Entered: 03/24/2025)
03/24/2025	99	MOTION to Appoint Counsel by John William Liccione. (e-portal) (JKB) Motions referred to Magistrate Judge Natalie Hirt Adams. (Entered: 03/24/2025)
03/24/2025	100	AMENDED MOTION to proceed In Forma Pauperis Case by John William Liccione. (e-portal) (Attachments: # 1 Amended Motion for IFP) (JKB) Modified event on 3/24/2025 (JKB). (Entered: 03/24/2025)
03/24/2025	101	AMENDED MOTION to Appoint Counsel by John William Liccione. (e-portal) (Attachments: # 1 Text of Proposed Order) (JKB) Motions referred to Magistrate Judge Natalie Hirt Adams. (Entered: 03/24/2025)
03/24/2025	102	MOTION for miscellaneous relief, specifically to file sworn declaration under seal by John William Liccione. (e-portal) (Attachments: # 1 Text of Proposed Order, # 2 Sworn Declaration) (JKB) Modified event on 3/24/2025 (JKB). (Entered: 03/24/2025)

03/24/2025	103	ENDORSED ORDER granting 82, 87, and 91 Motions to Stay Discovery. Generally, unilateral motions to stay discovery are disfavored. See Middle District Discovery (2021) at Section I.E.4. However, having reviewed the pending motions to dismiss, which raise potentially dispositive legal challenges to the lawsuit, I find that allowing discovery on the numerous claims presently in flux (see Docs. 59, 71, 80, 81), would create an undue burden and would be inconsistent with Rule 1 of the Federal Rules of Civil Procedure. Accordingly, discovery is STAYED as to each movant until its respective motion to dismiss is resolved (Docs. 59, 71, 80, 81). Signed by Magistrate Judge Natalie Hirt Adams on 3/24/2025. (CJF) (Entered: 03/24/2025)
03/28/2025	104	ENDORSED ORDER denying without prejudice 99 Motion to Appoint Counsel, in light of 101 Amended Motion to Appoint Counsel. Signed by Magistrate Judge Natalie Hirt Adams on 3/28/2025. (CJF) Modified to correct Scrivener's error re: ruling on 3/31/2025 (JNB). (Entered: 03/28/2025)
04/07/2025	105	Second MOTION for Extension of Time to File Response/Reply as to 83 MOTION to Amend 55 Amended Complaint, by Julie Marcus, Matt Smith. (Keefe, Andrew) (Entered: 04/07/2025)
04/07/2025	106	Unopposed MOTION for Extension of Time to File Response/Reply as to 83 MOTION to Amend 55 Amended Complaint, by Mindy Perkins. (Meros, Nicholas) (Entered: 04/07/2025)
04/08/2025	107	MOTION for Extension of Time to File Response/Reply as to 83 MOTION to Amend 55 Amended Complaint, by Cory Byrd, Andrew Darlington, Ron DeSantis. (Stafford, William) (Entered: 04/08/2025)
04/08/2025	108	Unopposed MOTION for Extension of Time to File Response/Reply as to 83 MOTION to Amend 55 Amended Complaint, by Wendy Link. (Schwinghammer, Gregor) (Entered: 04/08/2025)
04/10/2025	109	ORDER granting 105, 106, 107, 108; permitting each defendant to respond no later than April 30, 2025; denying as moot 98, 100--motions to proceed in forma pauperis; denying 101--motion for court-appointed counsel; denying 102--motion to submit under seal; directing the clerk to remove the seal from docket entry 98, from docket entry 100, and from docket entry 102; denying 95--motion for e-service. Signed by Judge Steven D. Merryday on 4/10/2025. (AP) (Entered: 04/10/2025)
04/11/2025	110	MOTION for Reconsideration of Order Denying Motion to seal; 109 Order on Motion for Miscellaneous Relief Order on Motion to Proceed In Forma Pauperis Order on Motion to Appoint Counsel Order on Motion for Extension of Time to File Response / Reply, by John William Liccione. (e-portal) (JKB) (Entered: 04/11/2025)
04/11/2025	111	MOTION for Reconsideration of Order Denying Motion for Appointment of Counsel: 109 Order on Motion for Miscellaneous Relief Order on Motion to Proceed In Forma Pauperis Order on Motion to Appoint Counsel Order on Motion for Extension of Time to File Response / Reply, by John William Liccione. (e-portal) (JKB) (Entered: 04/11/2025)
04/15/2025	112	ORDER denying 110, 111--motions for re-consideration. Signed by Judge Steven D. Merryday on 4/15/2025. (AP) (Entered: 04/15/2025)
04/19/2025	113	NOTICE of Withdrawal of Motion 83 MOTION to Amend 55 Amended Complaint, by John William Liccione. (AA) (e-portal) Modified text on 4/21/2025 (JNB). (Entered: 04/21/2025)
05/02/2025	114	MOTION for Joseph Van de Bogart to Withdraw as Attorney by Cory Byrd. (Van de Bogart, Joseph) (Entered: 05/02/2025)

05/09/2025	115	ENDORSED ORDER: Joseph S. Van de Bogart's motion (Doc. 114) to withdraw as counsel for Cord Byrd and for Andrew Darlington is GRANTED. Van de Bogart is WITHDRAWN as counsel. The clerk must terminate Van de Bogart from the service list. Signed by Judge Steven D. Merryday on 5/9/2025. (AP) (Entered: 05/09/2025)
06/27/2025	116	ORDER directing the plaintiff to either respond to each motion to dismiss or move to amend the complaint no later than July 10, 2025. Signed by Judge Steven D. Merryday on 6/27/2025. (AP) (Entered: 06/27/2025)
07/10/2025	117	MOTION for Extension of Time to Amend re 55 Amended Complaint, by John William Liccione. (e-portal) (Attachments: # 1 Exhibit A) (JKB) (Entered: 07/10/2025)
07/11/2025	118	NOTICE of change of address by John William Liccione. (e-portal) (JKB) (Entered: 07/11/2025)
07/11/2025	119	ENDORSED ORDER: The plaintiff moves (Doc. 117) to extend by seven days the time within which to either move to amend the complaint or respond to each motion to dismiss. The motion is GRANTED. No later than July 18, 2025, the plaintiff may either move to amend the complaint or respond to each motion to dismiss. Signed by Judge Steven D. Merryday on 7/11/2025. (AP) (Entered: 07/11/2025)
07/15/2025	120	NOTICE of a related action per Local Rule 1.07(c) by John William Liccione. Related case(s): Yes. (eportal) (Attachments: # 1 Exhibit A)(MCB) (Entered: 07/17/2025)
07/17/2025	121	MOTION to Consolidate Cases, MOTION to Transfer Case by John William Liccione. (eportal) (Attachments: # 1 Exhibit)(MCB) (Entered: 07/18/2025)
07/31/2025	122	MEMORANDUM in opposition re 121 Motion to Consolidate Cases, Motion to Change Venue / Transfer Case filed by Cory Byrd, Andrew Darlington, Ron DeSantis. (Hardy, Maryssa) (Entered: 07/31/2025)
07/31/2025	124	RESPONSE in Opposition re 121 MOTION to Consolidate Cases MOTION to Change Venue / Transfer Case filed by Wendy Link. (Schwinghammer, Gregor) (Entered: 07/31/2025)
07/31/2025	125	RESPONSE in Opposition re 121 MOTION to Consolidate Cases MOTION to Change Venue / Transfer Case filed by Julie Marcus, Matt Smith. (Keefe, Andrew) (Entered: 07/31/2025)
07/31/2025	126	RESPONSE in Opposition re 121 MOTION to Consolidate Cases MOTION to Change Venue / Transfer Case filed by Mindy Perkins. (Gibson, Benjamin) (Entered: 07/31/2025)
08/04/2025	127	EMERGENCY MOTION for Preliminary Injunction by John William Liccione. (AA) Modified text on 8/4/2025 (AA). (Note: Chambers has been notified.) (Entered: 08/04/2025)
08/11/2025	128	MOTION to Disqualify Counsel, MOTION to Strike 71 MOTION to Dismiss Plaintiff's First Amended Complaint with Incorporated Memorandum of Law , 125 Response in Opposition to Motion, 59 MOTION to Dismiss First Amended Complaint 91 Motion to Stay Discovery by John William Liccione. (AA) Motions referred to Magistrate Judge Natalie Hirt Adams. (Entered: 08/13/2025)
08/14/2025	129	RESPONSE in Opposition re 127 MOTION for Preliminary Injunction filed by Mindy Perkins. (Gibson, Benjamin) (Entered: 08/14/2025)
08/18/2025	130	RESPONSE in Opposition re 127 MOTION for Preliminary Injunction filed by Cory Byrd, Andrew Darlington, Ron DeSantis. (Hardy, Maryssa) (Entered: 08/18/2025)
08/19/2025	131	RESPONSE in Opposition re 127 MOTION for Preliminary Injunction <i>and Joinder in State Defendants' Response in Opposition to Plaintiff's Motion for Preliminary Injunction</i>

		[DE 130] filed by Wendy Link. (Schwinghammer, Gregor) (Entered: 08/19/2025)
08/20/2025	132	ORDER granting 59, 67, 71, 80, 81--motions to dismiss; dismissing with prejudice Count II, Count IV, and Count VIII; dismissing the balance of the complaint without prejudice and with leave to amend; denying 127--motion for a preliminary injunction; denying 128--motion to "disqualify counsel"; denying 121--motion to transfer the action. Signed by Judge Steven D. Merryday on 8/20/2025. (AP) (Entered: 08/20/2025)
09/19/2025	134	ENDORSED ORDER: An earlier order (Doc. 132) dismissed Counts I, III, V, VI, and VII without prejudice and Counts II, IV, and VIII with prejudice. Plaintiff fails to timely amend the complaint. The action is DISMISSED, and the clerk is directed to close the case. Signed by Senior District Judge Steven D. Merryday on 9/19/2025. (DM) (Entered: 09/19/2025)
09/22/2025	135	NOTICE of Local Rule 1.11(e), which provides that, unless an order states another time, a seal under Rule 1.11 expires ninety days after a case is closed and all appeals are exhausted. To prevent the content of a sealed item from appearing on the docket after the seal expires, a party or interested non-party must move for relief before the seal expires. (Signed by Deputy Clerk). (ELA) (Entered: 09/22/2025)

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