

IN THE SUPREME COURT OF THE STATE OF FLORIDA

JEB BUSH,
Governor of the State of Florida,

Appellant,

SC04-925
CASE NO.: SC03-925
L.T. No.: 2D04-2045

MICHAEL SCHIAVO, as the guardian of
the person of THERESA MARIE SCHIAVO,

Appellee.

**NOTICE OF RELATED CASE;
CONCURRENT MOTION TO PERMIT FILING OF AMICUS CURIAE
BRIEF BY AMICUS GORDON WATTS in support of Appellee, Michael
Schiaivo's petition to affirm; AND MOTION TO CONSOLIDATE**

Mr. Gordon Wayne Watts, a Florida citizen, by and through the undersigned, hereby gives notice to This Court of a Related case, SC03-2420, an active case before This Court.

Movant, Gordon Wayne Watts, by and through the undersigned, and pursuant to Rule 9.370, Fla.R.App.P., hereby moves court for permission to submit an amicus curiae brief in the above-captioned matter. In support of this matter, Movant states as follows:

1. Movant is a Florida citizen, who is genuinely affected by the ~~poor~~ administration of the **Laws of the State of Florida** by appellant, Governor, John Ellis Bush, AKA Jeb Bush. To that end, Movant declares standing.

even more than out-of-state Amicii (DW)

2. Movant Watts has studied the matter and actively participated in no less than three (3) venues, one of which is This Court, in case number SC03-2420, and therefore would offer This Court a unique perspective, objective in support of aspects of both cases, yet coming squarely down on the side of a ruling to affirm.

3. **Movant is authorized to represent to This Court** that he has conferred with the counsel for the Appellant, and counsel, Ken Connor, has no

objection to the filing of an amicus brief; **Movant is authorized to represent to This Court** that he has conferred with counsels for the Appellee, and counsels Robert Portman and George Felos do affirmatively object to the filing of an amicus brief by Movant supporting Appellee Michael Schiavo's petition to affirm, in spite of This Court's authority to grant permission to file said *amicus curiae* brief.

4. Movant Watts' amicus brief shall actively support the petition to affirm, and, as such, said brief is due on the same date as Answer brief of Appellee, Michael Schiavo, namely today, **Monday, July 26, 2004, before midnight**, and is being submitted in a timely fashion, in accordance with Rule 9.420, Fla.R.App.P., which gives **5** extra days for the instant brief to arrive, if served by **U.S. Postal Mail**.

5. Movant shall support the answer brief of Appellee, which seeks to affirm, but shall arrive at this conclusion from the opposite of the argument, based on the contention that, although Florida Public Law 2003-418, colloquially known as "Terri's Law," is not unconstitutional, it should nonetheless not be supported based on prior holdings of **This Court**, which hold that, even if extraordinary relief is entitled, it should not be granted if confusion of harm will occur, namely the harm of failure to enforce a multitude of other Florida Laws, which laws are even more effective in granting relief and protection to the person of Theresa Schiavo and other individuals in her situation. **In support whereof**, Movant cites the following: "This court is committed to the doctrine that extraordinary relief will not be granted in case where it plainly appears that although the complaining party [Bush] may be ordinarily entitled to it, if the granting of such relief in the particular case will result in confusion and disorder and will produce an injury to the public which outweighs the individual right of the complainant to have the relief he seeks." State ex rel. Pooser v. Wester, 126 Fla. 49, 54 170 So. 736, 738-39 (Fla. 1936) (citations omitted; emphasis and comments added; Justice Terrell for The Court)

WHEREFORE, Movant respectfully requests this Court grant permission to file an amicus curiae brief in this matter.

WHEREFORE, Movant respectfully requests this Court consolidate the above-captioned matter with case number **SC03-2420, In re Watts (on behalf of Schiavo)**.

Respectfully submitted,


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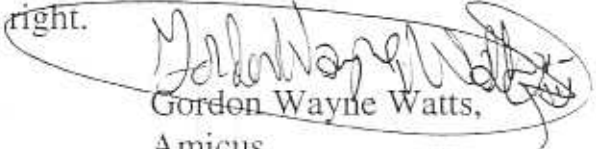
Layman of the Law, PRO SE; PRO PER

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy hereof has been furnished to the following parties by FIRST CLASS US POSTAL MAIL, this 26th day of July, 2004 to the following: **George J. Felos, Esq.** - 595 Main Street - Dunedin, FL 34698-4998; **Kenneth L. Connor, Esq., Camille Godwin, Esq.**, Counsel for Respondent Governor Jeb Bush - c/o Wilkes & McHugh, P.A., One North Dale Mabry, STE 800 Tampa, FL 33609 2755; **Jay Vail, Esq., Christina Calamas, Esq.** - Office of the Attorney General - Plaza Level 01 400 South Monroe Street - Tallahassee, FL 32399-5536; **Thomas J. Perrelli, Esq., Robert M. Portman, Esq., Nicole G. Berner, Esq.** 601 13th Street, NW, STE 1200 - Washington, DC 20005-3823; **Randall C. Marshall, Esq.** - American Civil Liberties Union of Fla. 4500 Biscayne Blvd., STE 340 - Miami, FL 33137-3227; **Patricia Fields Anderson, Esq.**, Attorneys for the Schindler family 447 Third Avenue North, STE 405 - St. Petersburg, FL 33701-3255; **Jay Alan Sekulow, Esq., David A. Cortman, Esq.** - American Center for Law and Justice 201 Maryland Ave., NE - Washington, DC 20002-5703

CERTIFICATE OF FONT SIZE, FONT TYPE, AND MARGINS

Pursuant to Fla.R.App.P.9.210(a), I hereby certify that standards were met by using the following in typeset: Font Size = 14 ; Font Type = "Times New Roman" ; Margins = 1 inch in top, bottom, left, and right.


Gordon Wayne Watts,

Amicus