

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

No. 14-14061-AA

JAMES DOMER BRENNER, *et al.*, *Plaintiffs-Appellees*,
v.
JOHN ARMSTRONG, *et al.*, *Defendants-Appellants*.

No. 14-14066-AA

SLOAN GRIMSLEY, *et al.*, *Plaintiffs-Appellees*,
v.
JOHN ARMSTRONG, *et al.*, *Defendants-Appellants*.

Appeals from the U.S. District Court, Northern District, Florida

Motion for Leave to file out of time “**AMENDED**
AMICUS CURIAE BRIEF OF GORDON WAYNE WATTS, SUPPORTING
PETITION OF DEFENDANT, JOHN ARMSTRONG, RE: FLORIDA LAW,
BUT SUPPORTIVE OF SOME ELEMENTS OF PLAINTIFFS' PETITION”

The name, office address, and telephone number of counsel[*]
representing the party for whom the brief is filed:

Gordon Wayne Watts, Amicus

821 Alicia Road, Lakeland, Florida 33801-2113

Official URL's: <http://GordonWatts.com> / <http://GordonWayneWatts.com>

Home Phone: (863) 688-9880 ; E-mail: gww1210@aol.com ;

gww1210@gmail.com ; Work Phones: 863-686-3411 and 863-687-6141

BS, The Florida State University, Biological & Chemical Sciences;

Class of 2000, double major with honours

AS, United Electronics Institute, Class of 1988, Valedictorian

LAYMAN OF THE LAW:

Gordon W. Watts, PRO SE / PRO PER

[*] *Mr. Watts, acting as his own counsel, is not a lawyer.*

U.S. COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

**CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT**

Brenner, et al v. Armstrong, et al, Appeal No: 14-14061-AA

Grimsley, et al v. Armstrong, et al, Appeal No: 14-14066-AA

Amicus, Gordon Wayne Watts, pursuant to 11th Cir. R. 26.1-1, hereby certifies that the following is a list of trial judge(s), and all attorneys, persons, associations of persons, firms, partnerships, or corporations that have an interest in the outcome of this case or appeal, including subsidiaries, conglomerates, affiliates and parent corporations, including any publicly held corporation that owns 10% or more of the party's stock, and other identifiable legal entities related to a party those who have an interest in the outcome of this case and/or appeal:

16 Scholars of Federalism and Judicial Restraint

64 Scholars of the Institution of Marriage

Abudu, Nancy

Alvare, Helen M.

American Civil Liberties Union of Florida, Inc., The

American Civil Liberties Union Foundation, Inc.

American Civil Liberties Union Foundation of Florida, Inc., The

Albu, Joyce

Alliance Defending Freedom

Anderson, Ryan T.

Andrade, Carlos

American College of Pediatrics

Brenner, et al v. Armstrong, et al, Appeal No: 14-14061-AA
Grimsley, et al v. Armstrong, et al, Appeal No: 14-14066-AA

Andrade, Carlos

Armstrong, Dr. John H.

Ausley & McMullen, P.A.

Babione, Byron Jeffords

Bazzell, Harold

Becket Fund for Religious Liberty

Bledsoe, Jacobson, Schmidt, Wright & Wilkinson

Bledsoe, Schmidt & Wilkinson, P.A.

Bondi, Pamela Jo

Boyle, David

Bradley, Gerard V.

Brenner, James Domer

Church of Jesus Christ of Latter-day Saints

Citro, C. Anthony

Clark & Sauer, LLC

Cohen, Lloyd

Collier, Bob

Concerned Women for America

Cooper, Leslie

Brenner, et al v. Armstrong, et al, Appeal No: 14-14061-AA
Grimsley, et al v. Armstrong, et al, Appeal No: 14-14066-AA

Crampton, Stephen M.

Del Hierro, Juan

DeMaggio, Bryan E.

Dewart, Deborah Jane

Duncan, William C.

Dushku, Alexander

Emmanuel, Stephen C.

Esbeck, Carl H.

Esseks, James D.

Ethics & Religious Liberty Commission of the Southern Baptist Convention

Farr, Thomas F.

Fitschen, Steven W.

Fitzgerald, John

Florida Conference of Catholic Bishops, Inc.

Florida Family Action, Inc.

Franck, Matthew J.

Gantt, Thomas, Jr.

George, Robert P.

Gibbs, David C. III

Brenner, et al v. Armstrong, et al, Appeal No: 14-14061-AA
Grimsley, et al v. Armstrong, et al, Appeal No: 14-14066-AA

Girgis, Sherif

Goldberg, Arlene

Goldberg, Suzanne B.

Goldwasser, Carol (deceased)

Goodman, James J., Jr.

Goodman, Jeff

Graessle, Jonathan W.

Grimsley, Sloan

Gunnarson, R. Shawn

Hankin, Eric

Harmer, John L.

Hinkle, Hon. Robert L.

Hueso, Denise

Humlie, Sarah

Hunziker, Chuck

Jacobson, Samuel S.

Jacobson Wright & Sussman, P.A.

Jeff Goodman, PA

Jones, Charles Dean

Brenner, et al v. Armstrong, et al, Appeal No: 14-14061-AA
Grimsley, et al v. Armstrong, et al, Appeal No: 14-14066-AA

Kachergus, Matthew R.

Kayanan, Maria

Knippenberg, Joseph M.

Liberty Counsel, Inc.

Liberty Counsel Action, Inc.

Liberty, Life, and Law Foundation

Lopez, Robert Oscar

Loukonen, Rachel Spring

Loupo, Robert

Lutheran Church-Missouri Synod

Marriage Law Foundation

McAlister, Mary E.

McHugh, Dr. Paul

Mihet, Horatio G.

Milstein, Richard

Myers, Lindsay

Nagel, Robert

National Association of Evangelicals

Newson, Sandra

Brenner, et al v. Armstrong, et al, Appeal No: 14-14061-AA
Grimley, et al v. Armstrong, et al, Appeal No: 14-14066-AA

Nicgorski, Walter

Nichols, Craig J.

NORTH CAROLINA VALUES COALITION AND LIBERTY, LIFE, AND LAW
FOUNDATION

Picarello, Jr., Anthony R.

Podhurst Orseck, P.A.

Presser, Stephen B.

Rhoads, Steven E.

Rosenthal, Stephen F.

Rossum, Ralph A.

Russ, Ozzie

Sauer, Dean John

Save Foundation, Inc.

Schaerr, Gene C.

Schaff, Jon D

Schlairet, Stephen

Schlueter, Nathan

Scott, Rick

Sevier, Chris

Shah, Timothy Samuel

Brenner, et al v. Armstrong, et al, Appeal No: 14-14061-AA
Grimsley, et al v. Armstrong, et al, Appeal No: 14-14066-AA

Shatz, Benjamin Gross

Sheppard, White, Kachergus and DeMaggio, P.A.

Sheppard, William J.

Smith, Hannah

Smith, Michael Francis

Smith, Steven

Snell, R.J.

Snider, Kevin Trent

Stampelos, Hon. Charles A.

Staver, Anita L.

Staver, Mathew D.

Stevenson, Benjamin James

Tanenbaum, Adam Scott

Tilley, Daniel Boaz

Trent, Edward Howard

Ulvert, Christian

U.S. Conference of Catholic Bishops

Watson, Bradley C.S.

Watts, Gordon Wayne

Brenner, et al v. Armstrong, et al, Appeal No: 14-14061-AA
Grimsley, et al v. Armstrong, et al, Appeal No: 14-14066-AA

Weaver, George Marvin

White, Elizabeth Louise

Winsor, Allen C.

Amicus, Gordon Wayne Watts, is an individual, not a corporation, and accordingly does not does not issue any stock and does not have any parent corporations or any publicly held corporations that own 10 percent or more of stock of that nonexistent parent corporation.

/s/ _____ Date: _____
Gordon Wayne Watts
821 ALICIA RD
LAKELAND, FL 33801-2113

Motion for Leave to file out of time “AMENDED
**AMICUS CURIAE BRIEF OF GORDON WAYNE WATTS, SUPPORTING
PETITION OF DEFENDANT, JOHN ARMSTRONG, RE: FLORIDA LAW,
BUT SUPPORTIVE OF SOME ELEMENTS OF PLAINTIFFS' PETITION”**

Pursuant to Rule 2, Fed.R.App.P., Suspension of Rules, I am asking This Court to allow me to file an amended brief to replace the one already on docket.

1. I filed a timely amicus by right and with consent of the parties, and it is on the docket.
2. After filing my amicus, I noticed a grave omission: I neglected to ask This Court for specific relief in the Conclusion (which was added in 2 additional arguments in the amended brief).
3. In addition, I discovered a number of small typos.
4. When reviewing the online docket using PACER, I noticed This Court generously offering another litigant, C. Anthony Citro, the opportunity to move This Court to request the opportunity to file out of time.
5. Since my brief already made compelling arguments about offering unique insight (that other litigants omitted or neglected), which was hinted at by my 4-3 loss in the Fla. Supreme Court on behalf of Theresa 'Terri' Schiavo (and cited in the opening statement), I believe it would be appropriate to allow me “one more chance” to overcome my own human error.

Although I nearly won in court – all by myself – on behalf of Terri Schiavo, in case number SC03-2420, doing better than both a sitting governor and Schiavo's blood family, nonetheless, I am only human.

This Amended brief contains the same materials, but it also adds what should have been put in my original brief.

Therefore, I respectfully move This Court, for good cause, to allow me to file this amended brief out of time.

Respectfully submitted,

Date: _____

Gordon Wayne Watts, Amicus
821 Alicia Road
Lakeland, Florida 33801-2113

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this Saturday, the 13th day of December, 2014, a true copy of the foregoing **motion** was filed to the following parties by FedEx **USPS Next Day**: US Courts of Appeals, Eleventh Circuit, 56 Forsyth Street, N.W., Atlanta, Georgia 30303, Phone: (404) 335-6100 [An original and 3 copies]

In accordance with Rule 25(c)(4), Manner of Service, “Service by mail or by commercial carrier is complete on mailing or delivery to the carrier,” which I hereby certify that I am doing today, Saturday, the 13th day of December, 2014, to the following parties (below), by U.S. Postal Mail –and by Electronic Mail, when/where possible. Additionally, I hope to post a TRUE COPY of these filings on my Open Source online docket, for free download, at the following three (3) URL's, as soon as practically possible:

<http://www.PRWeb.com/releases/2014/12/prweb12361433.htm>

and:

<http://www.GordonWatts.com/DOCKET-GayMarriageCase.html>

and:

<http://www.GordonWayneWatts.com/DOCKET-GayMarriageCase.html>

/s/ _____

Gordon Wayne Watts, Amicus

Parties:

Byron Jeffords Babione, bbabione@alliancedefendingfreedom.org
Alliance Defending Freedom
15100 N 90TH ST
SCOTTSDALE, AZ 85260-2901

Pamela Jo Bondi, Fla. Attorney General, pam.bondi@myfloridalegal.com ;
info@PamBondi.com

Allen C. Winsor, Fla. Solicitor General, allen.winsor@myfloridalegal.com

Adam Scott Tanenbaum, Chief Deputy Solicitor General,
adam.tanenbaum@myfloridalegal.com

c/o: Office of the Attorney General, The Capitol – PL01
Tallahassee, FL 32399-1050

Phone: (850) 414-3688; Fax: (850) 410-2672

[Counsel for the Secretary of the Florida, Department of Health and for the Secretary of the Florida Department of Management Services]

David Boyle, Esq., dbo@boyleslaw.org
Boyle Law Office
P.O. Box 15143
Long Beach, CA 90815

Gerard Vincent Bradley, Gerard.V.Bradley.16@nd.edu
Notre Dame Law School
3156 Eck Hall
326 LAW SCHOOL RM 3156
NOTRE DAME, IN 46556

C. Anthony Citro
254 SW 7TH ST
DANIA, FL 33004-3948

Leslie Cooper, ACLU Foundation, LCooper@aclu.org
James D. Esseks, Esq., JEsseks@aclu.org
125 Broad Street, 18th Floor
New York, New York 10004
Phone (212) 549-2627; Lcooper@aclu.org
[Counsel for Plaintiffs in lower tribunal case #: 4:14-cv-00107-RH-CAS]

Bryan E. DeMaggio, sheplaw@att.net
William J. Sheppard, sheplaw@att.net
Elizabeth Louise White, sheplaw@att.net
c/o Sheppard, White & Kachergus, P.A.
215 Washington Street
Jacksonville, Florida 32202
[Counsel for Plaintiffs-Appellees in Case No. 14-14061]

Deborah Jane Dewart; DebCpaLaw@earthlink.net
Deborah J. Dewart, Attorney at Law
620 E SABISTON DR
SWANSBORO, NC 28584

William C. Duncan, duncanw@marriagelawfoundation.org
Marriage Law Foundation
1868 N 800 E
LEHI, UT 84043

Alexander Dushku, Esq., adushku@kmclaw.com
R. Shawn Gunnarson, Esq., sgunnarson@kmclaw.com
Kirkton | McConkie
60 E. South Temple, Ste. 1800
Salt Lake City, UT 84111

Stephen C. Emmanuel, Ausley & McMullen, P.A.
Post Office Box 391
Tallahassee, FL 32301
Phone (850) 224-9115, semmanuel@ausley.com
[Attorney for amicus: Florida Conference of Catholic Bishops, inc.]

Stephen C. Emmanuel, Esq., Ausley & McMillen [Counsel for Amicus]
123 South Calhoun Street
Tallahassee, FL 32301

Carl H. Esbeck, Esq., EsbeckC@missouri.edu
Legal Counsel, Nat'l Assn. Of Evangelicals
P.O. Box 23269
Washington, DC 20026

Steven W. Fitschen, nlf@nlf.net
National Legal Foundation
2224 VIRGINIA BEACH BLVD STE 204
VIRGINIA BCH, VA 23454-4285

David C. Gibbs III, DavidGibbs@ChristianLaw.org ; DGibbs@ChristianLaw.org
Gibbs Law Firm, PA
5666 SEMINOLE BLVD STE 2
SEMINOLE, FL 33772-7328

David C. Gibbs III, President, DGibbs@NCLL.org ; DGibbs@GibbsFirm.com
National Center for Life and Liberty
P.O. Box 270548
Flower Mound, TX 75027-0548

Suzanne B. Goldberg, sgoldb1@law.columbia.edu
Columbia Law School
Jerome Green Hall 515
435 W 116TH ST
NEW YORK, NY 10027

James J. Goodman, Jr. of Jeff Goodman, P.A.,
946 Main Street
Chipley, Florida 32428
Phone: (850) 638-9722; Fax: (850) 638-9724
office@jeffgoodmanlaw.com
[Counsel for Washington County Clerk of Court]

John L. Harmer, Of counsel, LightedCandleSociety@msn.com
The Lighted Candle Society
818 Connecticut Ave. N.W. Ste.
1100, Washington, D.C. 20006

Samuel S. Jacobson, sam@jacobsonwright.com ; kathy@jacobsonwright.com
Bledsoe, Jacobson, Schmidt, Wright et al.
1301 Riverplace Boulevard, Suite 1818
Jacksonville, Florida 32207
[Counsel for Plaintiffs-Appellees in Case No. 14-14061]

Maria Kayanan, mkayanan@aclufl.org
Nancy Abudu, NAbudu@aclufl.org
Daniel Boaz Tilley, dtilley@aclufl.org
ACLU FOUNDATION OF FLORIDA, INC.
4500 Biscayne Blvd Ste 340
Miami, Florida 33137-3227
Phone (786) 363-2700
[Counsel for Plaintiffs-Appellees in Case No. 14-14066]

Rachael Spring Loukonen, RLoukonen@CohenLaw.com
Cohen & Grisby, PC
9110 STRADA PL STE 6200
NAPLES, FL 34108
Mary Elizabeth McAlister ; court@lc.org
Liberty Counsel, Inc.
PO BOX 11108
LYNCHBURG, VA 24506

Horatio G. Mihet, hmihet@liberty.edu ; HMihet@gmail.com
LIBERTY COUNSEL
1055 Maitland Center Commons Floor 2
Maitland, Florida 32751-7214
[Counsel for Amicus]

Anthony R. Picarello Jr., APicarello@USCCB.org
USCCB, Office of General Counsel
3211 4TH ST NE
WASHINGTON, DC 20017

Stephen F. Rosenthal, srosenthal@podhurst.com
Podhurst Orseck, P.A.
25 West Flagler Street, Suite 800
Miami, Florida 33130
Phone: (305) 358-2800
[Counsel for Plaintiffs-Appellees in Case No. 14-14066]

Dean John Sauer, JSauer@clarksauer.com
Clark & Sauer, LLC
7733 FORSYTH BLVD STE 625
ST LOUIS, MO 63105

Gene C. Schaerr, gschaerr@gmail.com
Law Offices of Gene Schaerr
332 CONSTITUTION AVE NE
WASHINGTON, DC 20002

GENE C. SCHAERR, Sutherland Institute, gschaerr@gmail.com
Gateway Tower West Building
15 West South Temple, Suite 200
Salt Lake City, UT 84101

Benjamin Gross Shatz, bshatz@manatt.com
Manatt Phelps & Phillips, LLP
11355 W OLYMPIC BLVD
LOS ANGELES, CA 90064-1614

William J. Sheppard, sheplaw@att.net
c/o Sheppard, White & Kachergus, P.A.
215 Washington Street
Jacksonville, Florida 32202

Hannah C. Smith, smith@becketfund.org
The Becket Fund for Religious Liberty
1200 NEW HAMPSHIRE AVE NW STE 700
WASHINGTON, DC 20036

Michael Francis Smith, smith@smithpllc.com
The Smith Appellate Law Firm
1717 PENNSYLVANIA AVE NW STE 1025
WASHINGTON, DC 20006

Kevin Trent Snider, ksnider@pji.org
Pacific Justice Institute
9851 HORN RD STE 115
SACRAMENTO, CA 95827

Kevin T. Snider, Esq., ksnider@pji.org
PACIFIC JUSTICE INSTITUTE
212 9th Street, Suite 208
Oakland, California 94607

MATHEW D. STAVER, ANITA L. STAVER, court@lc.org ; Liberty@LC.org
HORATIO G. MIHET, hmihet@liberty.edu ; HMihet@gmail.com
Liberty Counsel
P.O. Box 540774
Orlando, FL 32854

Adam Scott Tanenbaum, adam.tanenbaum@myfloridalegal.com
Office of the Attorney General
THE CAPITOL PL-01
TALLAHASSEE, FL 32399-1050

Daniel Boaz Tilley, DTilley@aclufl.org
ACLU FOUNDATION OF FLORIDA, INC.
4500 Biscayne Blvd Ste 340
Miami, Florida 33137-3227

Edward Howard Trent, ETrent@WimberlyLawson.com
Wimberly Lawson Wright Daves & Jones, PLLC
550 W MAIN ST STE 900
KNOXVILLE, TN 37902

George Marvin Weaver, GWeaver@hw-law.com
Hollberg & Weaver, LLP
2921 PIEDMONT RD NE STE C
ATLANTA, GA 30305-2784

Elizabeth Louise White, sheplaw@att.net
Sheppard White & Kachergus, PA
215 WASHINGTON ST
JACKSONVILLE, FL 32202

Allen C. Winsor, allen.winsor@myfloridalegal.com
Office of the Attorney General
THE CAPITOL PL-01
TALLAHASSEE, FL 32399-1050