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**IN THE SECOND DISTRICT COURT OF APPEAL
STATE OF FLORIDA**

LEAH A. RUBIN-BURRASCA

Appellant/Petitioner

v.

Case No. 2D22-621

**TREA 1560 CENTRAL AVENUE LLC A DELAWARE LIMITED LIABILITY
COMPANY AUTHORIZED TO DO BUSINESS IN FLORIDA AS
LANDLORD OF FUSION 1560**

Appellee/Respondent

**MEMORANDUM IN SUPPORT OF APPELLANT'S
PETITION TO INVOKE DISCRETIONARY JURISDICTION**

The Appellant, Leah A. Rubin-Burrasca, is in the process of petitioning the Florida Supreme Court to invoke its discretionary jurisdiction to review the Second District Court of Appeal's (the "Court" or the "Second District") decision rendered on May 25, 2022 denying Appellant's request to have video recordings of electronic court proceedings in her trial and earlier hearings (the "Requested Supplementary Materials") (i) be made part of the Record on Appeal, or (ii) in the alternative, to compel the Pinellas County Clerk to release copies of such video recordings to each of the parties to the Appeal (copy attached as Schedule "A"). This memorandum is in support of such

petition.

SUMMARY OF REASONS FOR APPELLANT'S PETITION

The Court denied Appellant's motion to supplement the record or, in the alternative, to provide copies of the Requested Supplemental Materials to both Appellant and Appellee for their review and use in the preparation of their respective appeal briefs.

This decision by the Second District is within the discretionary jurisdiction of the Florida Supreme Court because (i) the Second District decision is, in part, in direct conflict with certain provisions of Administrative Order No. 2018-042 PA/PI-CIR of the Chief Judge of the Sixth Judicial Circuit for the Counties of Paseo and Pinellas, Florida; and (ii) because it expressly and directly conflicts with the Appellant's right to substantive due process in the appellate review of her case (i.e., it violates the due process clauses of the Fifth and Fourteenth amendments to the U.S. Constitution, which prohibit the federal and state governments (including the courts thereof), respectively, from depriving any person of "life, liberty, or property, without due process of law").

Underlying this prohibition and its guarantee of due process is the notion that, procedurally, at a minimum, in addition to adequate notice, a litigant must be given a "fair and impartial hearing", something which

Appellant fervently (and many others who have observed the various court proceedings in Appellant's case just as strongly) believe did not occur in Appellant's case.

Accordingly, given this lack of substantive due process afforded Appellant, coupled with the serious crisis of confidence with which courts around the nation, in general, are currently being confronted, in Appellant's opinion, granting Appellant review of the Second District's decision is not only judicially required (insofar as the decision clearly violates (i) the provision of Section G.1. of Administrative Order No. 2018-042 PA/PI-CIR, and (ii) violates Appellant's substantive due process rights in the appellate review process), but, additionally, will, in Appellant's opinion, be tremendously helpful in restoring respect for the courts and signaling an enormous movement toward much greater transparency in the administration of justice, something which the general public is craving.

Thus, this is an issue, while admittedly of first impression, is nevertheless one of "great public importance."

RELEVANT BACKGROUND

1. Appellant has timely filed its Notice of Appeal seeking to overturn the contested lower tribunal final order at the center of the above referenced

appeal (the “Appeal”), to wit, Judgment for Possession dated February 25, 2022. A copy of such Notice of Appeal and the challenged court order (the “Court Order”) is attached hereto as Schedule A.

2. Appellant is appealing the Court Order (and all of the interim orders and judicial proceedings in her case leading up to the Court Order) on a number of grounds, including, but not limited to:

a. Failure of the Court to adequately address the Appellant’s Anti-SLAPP motion before committing the Appellant to pay rent into the court registry and its continuing failure to address such motion at any time thereafter;

b. Failure of the Court to give due consideration to the Appellant’s affirmative defenses, including but not limited to
(i) retaliatory eviction,
(ii) breach of the warranty of habitability due to significant water intrusion and the resulting existence of mold and insect infestation, and

(iii) breach of the warranty by Appellee of its obligation to provide quiet enjoyment to Appellant in her use of her leased premises (the “Leased Premises”) due to Appellee’s failure to adequately police and apply sanctions against The Local Draught House (i.e., the bar

tenant of Appellee which occupied the space immediately beneath the Leased Premises (the “Bar Tenant”)) for Bar Tenant’s continuous harassment of Appellant, despite Appellee’s clear right and ability to do so under the terms of its lease with such Bar Tenant;

c. The failure of the Court to give due consideration to, and the failure by the Court to correctly analyze, the intersection of subsections (2) and (3) of Section 83.64 of the Florida Residential Landlord Tenant Act; and

d. The clear and apparent bias, dismissiveness and utter contempt with which the Court treated the Appellant’s defense, the Appellant herself, Appellant’s counsel and the various witnesses for the Appellant in the immediately concluded proceeding, as well as the clear irritation with, and dismissal of, and the general bias demonstrated against, Appellant and her defense which the justices in the earlier hearings demonstrated as well.

**GROUND UPON WHICH THE PRIOR MOTION WAS
BASED AND THE ARGUMENTS PREVIOUSLY MADE IN
SUPPORT OF AN ORDER FOR THE RELIEF REQUESTED**

3. Prior to the Covid-19 Pandemic (“Pandemic”), Appellant was a server employed by Café Gala, the restaurant maintained by the subcontractor of St. Petersburg’s Dali Museum for its patrons, but the

advent of the Pandemic in March of 2019 permanently ended Appellant's employment with such employer.

4. Notwithstanding Appellant's loss of employment in March of 2019, Appellant continued to find ways to pay rent to the Appellee so that, by the time of the Court's Order on February 25, 2022 (from which this Appeal is taken), all rental payments required under the terms of Appellant's lease with Appellee had been satisfied.

5. At the same time, Appellant was forced to expend additional funds (i.e., attorneys fees and court costs) defending against the Appellee's attempt to evict her in retaliation for her complaints to the various municipal authorities (i.e., St Petersburg Code Compliance, Police Department and Fire Departments, Health and Welfare agencies, etc.) regarding Appellee's failures to observe its various public health, welfare and safety obligations under law. Such litigation and related expenses continued for more than a year, despite the fact that in choosing to defend herself against an illegal and unjustifiable eviction, Appellant was forced to severely strain her already limited resources.

6. As a consequence of the foregoing, Appellant was forced to file for indigent status in order to pursue this Appeal, which status was approved by the Clerk of the Circuit Court, Sixth Circuit, State of Florida, on

February 25, 2022 (See Grant of Indigent Status, attached hereto as Exhibit 1).

7. As an indigent, Appellant is unable to pay for transcripts of the prior electronic court proceedings in the litigation from which this appeal is taken (such prior electronic court proceedings being hereinafter referred to as the “ECPs”), which are estimated to cost, collectively, more than \$2,000, and then only after payment by Appellant of an invoice for \$925.00 for an expense previously incurred by Appellant’s former counsel, Timothy Driscoll, purportedly on Appellant’s behalf, but without her knowledge.

8. Separately, each of the judges who presided over Appellant’s case (and, in particular, Judge Bedinghaus) expressed a clear disdain of, and an overarching dislike of, and bias against, Appellant, and thus failed to provide Appellant with even the tiniest shred of the kind of objective and dispassionate due process to which she was entitled, the kind which is required in those special situations, like the one in which Appellant found herself, where a judge is adjudicating claims as complex as the ones asserted by Appellant in good faith, e.g., retaliatory eviction.

9. Consequently, even assuming that Appellant was financially able to pay for these transcripts (which Appellant clearly is not), such transcripts would nevertheless be worthless since without the video

recordings of the ECPS such transcripts by themselves would be incapable of revealing either the tone or demeanor expressed by the various judges' presiding over the ECPs and the fact that these justices disparaged and demeaned Appellant, and dismissed Appellant's claims out of hand, and without the slightest inclination to objectively consider any of Appellant's arguments.

10. Accordingly, only by being able to review, and to call to the attention of this Appeals Court, the manner in which Appellant and her case has been treated by the justices below (which can only be shown by the viewing of, and reference to, the actual footage of the video recordings of the ECPs), can the Appellant hope to demonstrate to this Appeals Court the clear bias and lack of objectivity which each of the justices in the proceedings below demonstrated, again and again, toward Appellant and her case. Thus, only by viewing and referring to such video recordings, will the actual truth of what transpired below be revealed.

11. Given the above, Appellant previously requested that the Second District Court of Appeals issue an order directing the Pinellas County Clerk of the Circuit Court, or such other agency of the courts below as may have control of the video recordings of the ECPs, to (i) include within the Record on Appeal, and/or (ii) issue to the parties to the instant

appeal, copies of the video recordings of each and every one of the ECPs that took place in the case from which this appeal is taken. This request was denied. It is this denial which now forms the basis for Appellant's petition to invoke the discretionary jurisdiction of the Florida Supreme Court on this issue, one, which admittedly, is one of first impression but of great public importance.

**THE CURRENT STATUS OF CONTROLLING LAW AND
THE BASIS FOR APPELLANT'S CURRENT INVOCATION OF
FLORIDA SUPREME COURT DISCRETIONARY JURISDICTION**

**A. The Second District's Order Directly Conflicts with
Administrative Order No. 2018-042 PA/PI-CIR**

12. According to Section A.2. of the Sixth Judicial Circuit's Administrative Order ("Re: Court Reporting Plan and Electronic Recordings of Court Proceedings" (Order No. 2018-042 PA/PI-CIR), the terms "electronic record" or "electronic recording" means the audio, analog, digital, or **video record of a court proceeding made using electronic equipment** owned or **operated by the Sixth Judicial Circuit.**" (Emphasis added). (See, Administrative Order No. 2018-042 PA/PI-CIR, Chief Judge of the Circuit Court, Sixth Judicial Circuit in and for Pasco and Pinellas Counties, Florida, hereinafter, the "Order").

13. Under a fair reading of the Order, any electronic record or recording of a court proceeding within the ambit of the Sixth Judicial Circuit and thus subject to the authority of the Chief Judge of the Sixth Judicial Circuit and his Order (e.g., a trial by a county court judge within the Sixth Judicial Circuit), constitutes an “electronic record” or “electronic recording” of that proceeding as defined under Section A.2. of the Order, even though the Circuit Court may not own such equipment but merely uses equipment, provided such use rises to the level of being “operated by the Sixth Judicial Circuit”.

14. While the Chief Judge, in promulgating the Order may not have foreseen the consequences to the judicial system in Florida wrought by the recent Covid-19 Pandemic, because of the Pandemic, and in order to continue to conduct business while keeping the judges and litigants safe, the Florida judicial system, including the courts within the Sixth Judicial Circuit, began to relying upon, for the first time, various technologies to conduct video meetings and recordings which it had not previously relied upon. Among these technologies was the Zoom online teleconferencing technology whereby participants in online meetings could rely on the Zoom software and their own personal computers to attend judicial proceedings. Thus, the Sixth Judicial Circuit, along with many, many other judicial

circuits both within and outside the state of Florida, “operated” in the strictest sense of the word, both equipment and video meeting and recording software which had not been previously authorized for use.

15. Thus, records and / or recordings of “virtual trials” that were conducted during or immediately after the most severe periods of the Pandemic fall squarely within the definition of such records and recordings under Section A.2. of the Order. This is true, even though the “equipment” that may have been used consisted, not only of the cameras, accompanying software and other equipment officially owned by Sixth Judicial Circuit, but that owned and used by judges and litigants (with respect to the latter, when expressly authorized under law), as well.

16. Consequently, any and all recordings of videos by the trial judges, including without limitation, all recordings of proceedings before Judge Bedinghaus, in the case from which Appellant’s appeal lies falls within the definition under Section A.2. of the Order.

17. Unfortunately, notwithstanding the fact that electronic records and recordings resulting from such trial judges use and operation of the equipment and software referenced above clearly falls with the relevant definitions under Section A.2., perversely Section A.3. of the Order (which defines the “Record”) posits, in relevant part, that:

“.... For all other court proceedings [e.g., proceedings such as the one in which Appellant was involved], the “official record” is the transcript, which is the written record of court proceedings as produced by a civil court reporter and filed with the Clerk of the Circuit Court. **The “official record” does not include CDs, DVDs, tapes, or any other electronic record of a court proceeding ...** “

18. But then, to confuse matters still further, Section G.1. of the Order goes on to provide that:

““All persons entering a courtroom in the Sixth Judicial Circuit are hereby notified that electronic recording equipment is in use and that anything said in the courtroom **may be electronically recorded and released upon request.**” (Emphasis added).

19. The rub here is that proceeding under Section G.1. of the Order is, of course, precisely what Appellant intended to do as an alternative to having the video recordings in question made part of the record, i.e., have copies of the video recordings in question be made available to both Appellant and Appellee in the Appeal in order for both parties to be in a position to point to specific instances in the unofficial record (as they prepared their respective briefs) for clarification and in order to present the truest picture of what transpired in the hearings conducted below.

20. It is these three sections of the Order which thus provide the grist for Appellant's first ground (i.e., direct conflict with the Order) in connection with Appellant's petition to have the Florida Supreme Court invoke its discretionary jurisdiction and review the Order.

B. The Court's Order Denies Appellant Substantive Due Process in Connection With its Review of the Lower Court Proceedings

21. In addition to being in direct conflict with Administrative Order No. 2018-042 PA/PI-CIR, this decision by the Second District is within the discretionary jurisdiction of the Florida Supreme Court because it expressly and directly conflicts with the Appellant's right to substantive due process in the administration and review of her case (i.e., it violates the due process clauses of the Fifth and Fourteenth amendments to the U.S. Constitution, which prohibit the federal and state governments (including the courts thereof), respectively, from depriving any person of "life, liberty, or property, without due process of law").

Underlying this prohibition and its guarantee of due process is the notion that, procedurally, at a minimum, in addition to adequate notice, a litigant must be given a "fair and impartial hearing", something which Appellant fervently (and many others who have observed the various court proceedings in Appellant's case just as strongly) believe did not occur in

Appellant's case.

Moreover, since Appellant is indigent and, as a consequence thereof, unable to pay for the court reporter services or the transcript of the various court proceedings, she is unable as a practical matter, in the absence of the requested video recordings, to have the evidence she needs to clearly demonstrate to the reviewing court the lack of impartiality and bias demonstrated by the various judges, and in particular, Judge Bedinghaus, before whom she came during the pendency of her case.

Accordingly, to deny Appellant (and her opponent), along with the Second District Court of Appeals, access to the video recordings of the various electronic (i.e., Zoom) court proceedings in her case would, essentially, deny her the due process review to which she is now entitled. This is at odds with the current overwhelming expressed societal demand for substantially-increased transparency in the conduct of judicial proceedings.

“Florida state courts tried over 700 civil jury cases to verdict between 2018 and 2019. When civil jury trials were suspended in March 2020, that number was drastically reduced, which is why the remote trial pilot program was authorized. Today, nearly eight months after civil trials were suspended, Florida’s court system reports a backlog of over 900,000 cases. *As health and safety concerns persist, there is speculation that remote proceedings, and now trials, will become the “new” normal.- If so, it is only a matter of time before the archived recordings become a source of interest for appellate courts and litigants, alike.*”

“It follows that these video recordings could one day become part of the record and, if so, may eliminate the need for appellate deference when based on the presumption that the trial court is entitled to deference because of its superior vantage point”. And, it won't be “*... the first time Florida's judiciary has led the way for judicial transparency or the use of technology.*”

Canfield, Rachel A., *Zooming in on the Impact Florida's Remote Civil Jury Trials May Have on Appellate Standards of Review* (Florida Bar Journal, Vol. 95, No. 1, January/February 2021, pg 30).

More to the point, the decision by this Court comes on the heels of a lawsuit which informed observers have described as a miscarriage of justice and it involves an Appellant who has been made indigent, not only by the actions and failures of her former landlord, but by the very judicial system itself. Moreover, it comes at a time when the judiciary as an institution is under attack and is suffering one of the most significant losses of credibility among members of the general public that it has ever suffered. Public dissatisfaction with current judicial system and its decision making, irrespective of whether such decisions are deemed to favor those who lean right or those who lean left, is proving to have a corrosive influence on the institution itself.

CONCLUSION

In conclusion, granting Appellant's request that the Florida Supreme Court invoke its discretionary jurisdiction to review of the Order of the Second District is not only judicially required (insofar as the decision clearly violates (i) the provision of Section G.1. of Administrative Order No. 2018-042 PA/PI-CIR, and (ii) constitutes a violation of Appellant's appellate review substantive due process rights), but would be, additionally, tremendously helpful in restoring respect for the courts and signaling an enormous movement toward much greater transparency in the administration of justice, something which the general public is craving.

As previously stated, thus, this is an issue, while admittedly of first impression, is nevertheless one of "great public importance."

Dated: August 15, 2022

Respectfully submitted,

Leah A. Rubin-Burrasca

Leah A. Rubin-Burrasca
Pro Se
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St. Petersburg, FL. 33702
(954) 706-6108
Penilayne411@gmail.com

SCHEDULE A

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT, POST OFFICE BOX 327, LAKELAND, FL 33802-0327

May 25, 2022

CASE NO.: 2D22-0621

L.T. No.: 2021-CC-002880

LEAH A. RUBIN-BURRASCA

v.

TREA 1560 CENTRAL AVENUE, LLC

Appellant / Petitioner(s),

Appellee / Respondent(s).

BY ORDER OF THE COURT:

Appellant's motion for order (i) to compel Pinellas County Clerk to include in the record on appeal (and/or release copies to the parties of) video recordings of all electronic court proceedings and (ii) for an extension of time to file Appellant's initial brief is granted only to the extent that Appellant shall serve the initial brief within thirty days of the date of this order. The motion is otherwise denied. *See Lee County v. Eaton*, 642 So. 2d 1126 (Fla. 2d DCA 1994); *Lavin v. State*, 861 So. 2d 488, 490 n.1 (Fla. 4th DCA 2003). Failure to timely serve the initial brief will subject this appeal to dismissal without further notice.

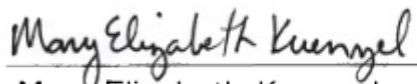
I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

Served:

CHARLES V. BARRETT, III, ESQ.
LEAH A. RUBIN-BURRASCA

TREA 1560 CENTRAL AVENUE, LLC
KEN BURKE, CLERK

ks



Mary Elizabeth Kuenzel
Clerk



EXHIBIT 1

- Appeal -



IN THE CIRCUIT/COUNTY COURT OF THE Sixth JUDICIAL CIRCUIT
IN AND FOR Pinellas COUNTY, FLORIDA

TREA 1560 Central Avenue LLC

CASE NO. 21-2880-CO

Plaintiff/Petitioner or In the Interest of

Leah A. Rubin-Burrisca vs.

Defendant/Respondent

APPLICATION FOR DETERMINATION OF CIVIL INDIGENT STATUS

Notice to Applicant: If you qualify for civil indigence, the filing and summons fees are waived; other costs and fees are not waived.

1. I have 0 dependents. (Include only those persons you list on your U.S. Income tax return.)

Are you Married? Yes No Does your Spouse Work? Yes No Annual Spouse Income? \$ _____

2. I have a net income of \$ 0 paid weekly every two weeks semi-monthly monthly yearly other _____
(Net income is your total income including salary, wages, bonuses, commissions, allowances, overtime, tips and similar payments, minus deductions required by law and other court-ordered payments such as child support.)

3. I have other income paid weekly every two weeks semi-monthly monthly yearly other 0
(Circle "Yes" and fill in the amount if you have this kind of income, otherwise circle "No")

Second Job	Yes \$ _____	<input checked="" type="checkbox"/> No	Veterans' benefits	Yes \$ _____	<input checked="" type="checkbox"/> No
Social Security benefits	Yes \$ _____	<input checked="" type="checkbox"/> No	Workers compensation	Yes \$ _____	<input checked="" type="checkbox"/> No
For you	Yes \$ _____	<input checked="" type="checkbox"/> No	Income from absent family members	Yes \$ _____	<input checked="" type="checkbox"/> No
For child(ren)	Yes \$ _____	<input checked="" type="checkbox"/> No	Stocks/bonds	Yes \$ _____	<input checked="" type="checkbox"/> No
Unemployment compensation	Yes \$ _____	<input checked="" type="checkbox"/> No	Rental income	Yes \$ _____	<input checked="" type="checkbox"/> No
Union payments	Yes \$ _____	<input checked="" type="checkbox"/> No	Dividends or interest	Yes \$ _____	<input checked="" type="checkbox"/> No
Retirement/pensions	Yes \$ _____	<input checked="" type="checkbox"/> No	Other kinds of income not on the list	Yes \$ _____	<input checked="" type="checkbox"/> No
Trusts	Yes \$ _____	<input checked="" type="checkbox"/> No	Gifts	Yes \$ _____	<input checked="" type="checkbox"/> No

I understand that I will be required to make payments for costs to the clerk in accordance with §57.082(5), Florida Statutes, as provided by law, although I may agree to pay more if I choose to do so.

4. I have other assets: (Circle "yes" and fill in the value of the property, otherwise circle "No")

Cash	Yes \$ _____	<input checked="" type="checkbox"/> No	Savings account	Yes \$ _____	<input checked="" type="checkbox"/> No
Bank account(s)	Yes \$ <u>\$1,600</u>	<input checked="" type="checkbox"/> No	Stocks/bonds	Yes \$ _____	<input checked="" type="checkbox"/> No
Certificates of deposit or	Yes \$ _____	<input checked="" type="checkbox"/> No	Homestead Real Property*	Yes \$ _____	<input checked="" type="checkbox"/> No
Money market accounts	Yes \$ _____	<input checked="" type="checkbox"/> No	Motor Vehicle*	Yes \$ <u>2,000</u>	<input checked="" type="checkbox"/> No
Boats*	Yes \$ _____	<input checked="" type="checkbox"/> No	Non-homestead real property/real estate*	Yes \$ _____	<input checked="" type="checkbox"/> No
			Other assets*	Yes \$ _____	<input checked="" type="checkbox"/> No

Check one: I DO DO NOT expect to receive more assets in the near future. The asset is _____.

5. I have total liabilities and debts of \$ _____ as follows: Motor Vehicle \$ 0, Home \$ _____, Boat \$ _____, Non-homestead Real Property \$ _____, Child Support paid direct \$ _____, Credit Cards \$ _____, Medical Bills \$ 10000, Cost of medicines (monthly) \$ _____, Other \$ Judgement & attorney fees \$20,000

6. I have a private lawyer in this case..... Yes No

A person who knowingly provides false information to the clerk or the court in seeking a determination of indigent status under s. 57.082, F.S. commits a misdemeanor of the first degree, punishable as provided in s. 775.082, F.S. or s. 775.083, F.S. I attest that the information I have provided on this application is true and accurate to the best of my knowledge.

Signed on February 25th 2022
1983

Signature of Applicant for Indigent Status
Print Full Legal Name Leah Aimee Rubin-Burrisca
Phone Number/s: 954 706 6108

Year of Birth _____ Last 4 digits of Driver License or ID Number _____
Email address: 5010

Address: 1560 Central Ave #208 St. Petersburg FL 33705
Address: Street, City, State, Zip Code

This form was completed with the assistance of: _____
Clerk/Deputy Clerk/Other authorized person.

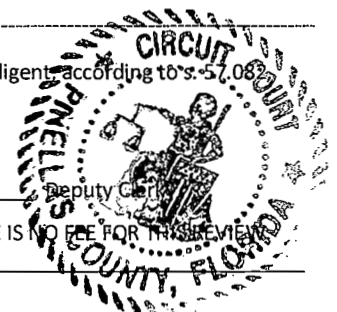
CLERK'S DETERMINATION

Based on the information in this Application, I have determined the applicant to be Indigent () Not Indigent, according to s. 57.082

F.S. _____
Dated on FEB 25 2022, 20 _____

Mark
Clerk of the Circuit Court

By _____ Deputy Clerk



APPLICANTS FOUND NOT TO BE INDIGENT MAY SEEK REVIEW BY A JUDGE BY ASKING FOR A HEARING TIME. THERE IS NO FEE FOR THIS REVIEW.
Sign here if you want the judge to review the clerk's decision _____

RECEIVED, 08/15/2022 09:47:22 PM, Clerk, Second District Court of Appeal

IN THE SECOND DISTRICT COURT OF APPEAL
STATE OF FLORIDA

LEAH A. RUBIN-BURRASCA

Appellant/Petitioner

v.

Case No. 2D22-621

TREA 1560 CENTRAL AVENUE LLC A DELAWARE LIMITED LIABILITY
COMPANY AUTHORIZED TO DO BUSINESS IN FLORIDA AS LANDLORD
OF FUSION 1560

Appellee/Respondent

**MOTION FOR ORDER TO COMPEL PINELLAS COUNTY CLERK TO
REFUND FEE FOR TRANSMISSION OF RECORD ON APPEAL IN CASE
NO. 21-2880-CO-41 WHERE FEE WAS MISTAKENLY PAID TO STATE
OF FLORIDA AT COUNTY CLERK'S INSISTENCE AND WHERE
APPELLANT HAD ALREADY BEEN JUDICIALLY-DECLARED INDIGENT:
APPEAL CASE NO. 2D22-621**

Appellant, Leah A. Rubin-Burrasca hereby moves the Court for an Order compelling the Clerk of the Pinellas County Court to refund a fee (previously paid by Appellant at great hardship) for transmission of the Record on Appeal to the Second District Court of Appeals in Case No. 21-2880-CO-41 where the fee was mistakenly paid to the State of Florida at the County Clerk's insistence despite the fact that Appellant had already been judicially-declared as having "indigent status" for purposes of this Appeal. As grounds therefore Appellant states the following:

INTRODUCTION

1. Appellant has timely filed its Notice of Appeal seeking to overturn the Court's final order in the above referenced case, to wit, Judgment for Possession dated February 25, 2022. A copy of such Notice of Appeal and the challenged court order (the "Court Order") is attached hereto as Exhibit 1.

2. Appellant is appealing the Court Order (and all of the interim orders and judicial proceedings in her case leading up to the Court Order) on a number of grounds, including, but not limited to:

a. Failure of the Court to adequately address the Appellant's Anti-SLAPP motion before committing the Appellant to pay rent into the court registry.

b. Failure of the Court to give due consideration to the Appellant's affirmative defenses, including but not limited to

(i) retaliatory eviction,

(ii) breach of the warranty of habitability due to water intrusion and the resulting existence of mold and insect infestation, and

(iii) breach of the warranty by Appellee of its obligation to provide quiet enjoyment to Appellant in her use of her leased premises (the "Leased Premises") due to Appellee's failure to adequately police and apply

sanctions against The Local Draught House (i.e., the bar tenant of Appellee which occupied the space immediately beneath the Leased Premises (the “Bar Tenant”)) for Bar Tenant’s continuous harassment of Appellant, despite Appellee’s clear right and ability to do so under the terms of its lease with such Bar Tenant.

c. The failure of the Court to give due consideration to, and the failure by the Court to correctly analyze, the intersection of subsections (2) and (3) of Section 83.64 of the Florida Residential Landlord Tenant Act.

d. The clear and apparent bias, dismissiveness and utter contempt with which the Court treated the Appellant’s defense, the Appellant herself, Appellant’s counsel and the various witnesses for the Appellant in the immediately concluded proceeding, as well as the clear irritation with, and dismissal of, and the general bias demonstrated against, Appellant and her defense which the justices in the earlier hearings demonstrated as well.

I. GROUNDS UPON WHICH THIS MOTION IS BASED

II. ARGUMENTS IN SUPPORT OF AN ORDER FOR THE RELIEF REQUESTED

3. Prior to the Covid-19 Pandemic (“Pandemic”), Appellant was a server employed by the Cat’s Eye Cafe, but the advent of the Pandemic in March of 2020 (the “Pandemic”) permanently ended Appellant’s employment with such employer.

4. Notwithstanding Appellant's loss of employment in March of 2020, Appellant continued to find ways to pay rent to the Appellee so that, by the time of the Court's Order on February 25, 2022 (from which this Appeal is taken), all rental payments required under the terms of Appellant's lease with Appellee had been satisfied.

5. At the same time, Appellant was forced to expend additional funds (i.e., attorneys fees and court costs) defending against the Appellee's attempt to evict her in retaliation for her complaints to the various municipal authorities (i.e., St Petersburg Code Compliance, Police Department and Fire Departments, Health and Welfare agencies, etc.) regarding Appellee's failures to observe its various public health, welfare and safety obligations under law. Such litigation and related expenses continued for more than a year, despite the fact that in choosing to defend herself against an illegal and unjustifiable eviction, Appellant was forced to severely strain her already limited resources.

6. As a consequence of the foregoing, Appellant was forced to file for indigent status in order to pursue this Appeal, which status was approved by the Clerk of the Circuit Court, Sixth Circuit, State of Florida, on February 25, 2022 (See Grant of Indigent Status, attached hereto as Exhibit 2).

7. As an indigent, Appellant was unable to pay for transcripts of the

prior electronic court proceedings in the litigation from which this Appeal is taken (such prior electronic court proceedings being hereinafter referred to as the "ECPs"), which are estimated to cost, collectively, more than \$2,000, and then only after payment by Appellant of an invoice for \$925.00 for an expense previously incurred by Appellant's former counsel, Timothy Driscoll, purportedly on Appellant's behalf, but without her knowledge.

8. Even assuming that Appellant was financially able to pay for these transcripts (which Appellant clearly is not), such transcripts would nevertheless be worthless since without the video recordings of the ECPS such transcripts by themselves would be incapable of revealing either the tone or demeanor expressed by the various judges' presiding over the ECPs and the fact that these justices disparaged and demeaned Appellant, and dismissed Appellant's claims out of hand, and without the slightest inclination to objectively consider any of Appellant's arguments.

9. Accordingly, after having her motion to obtain copies of such transcripts without payment having been denied by the Court (and by Judge Rondolino, acting on behalf of the Court; see Exhibit 3 attached), Appellant decided to temporarily forego any further efforts to secure such transcripts, and instead try to secure copies of the video recordings made of such ECPs, only to have her motion in that regard be denied as well (see attached copy

of order denying such motion labelled as Exhibit 4). Nevertheless, Appellant was determined to pursue her appeal, notwithstanding these denials and, accordingly, filed her initial preliminary Appellant Brief on June 24, 2022.

10. However, notwithstanding all of Appellant's diligent efforts to move her appeal forward, the Pinellas County Clerk refused to assist her in so doing by holding up transmission of the Record on Appeal to the Second District Court of Appeals until Appellant was able to pay a fee of \$503.00 (taxes and other assessments, if any, included), which for several weeks Appellant was unable to do. However, just several days before the due date of Appellant's filing deadline for her Appeal Brief, Appellant, by working two jobs (one as a kitchen cooking employee and other by doing food deliveries for Door Dash and other food delivery services), was Appellant finally able to piece enough money to pay the fee, which she did several days before the deadline for the submission of her brief.

11. Thus, despite great odds against her being able to do so, Appellant has demonstrated her determination to see justice done by having her Appeal be heard by the Second District.

12. With regard to the current motion, Appellant is merely asking the Court, despite all the injustice already visited upon her, to help her secure a refund of the money that should never have been demanded of Appellant

and which, consequently, was paid. Further, in Appellant's opinion, such demand by the Pinellas County Clerk was not only unjustified and illegal, but was used as another attempt to prevent her from having her voice heard by the Second Circuit and, hopefully, at last securing the fair hearing to which under the requirements of due process she is entitled.

13. Given the above, Appellant is requesting that this Appeals Court issue an order directing the Pinellas County Clerk of the Circuit Court (or such other agency of the courts below as may have control of funds mistakenly paid) to refund the amount previously paid by Appellant to the Pinellas County Clerk as a fee for the transmission of the Record on Appeal to the Second District Court of Appeals in connection with the instant appeal.

Dated: June 30, 2022

Respectfully submitted,

Leah A. Rubin-Burrasca

Leah A. Rubin-Burrasca
Pro Se
9079 4th Street North
St. Petersburg, FL 33702
+1 (954) 706-6108
penilayne411@gmail.com

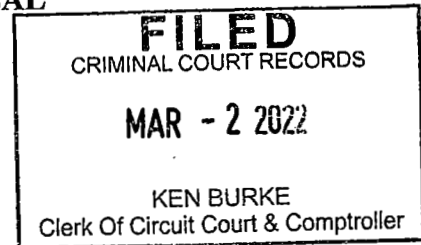
EXHIBIT 1

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


Case No. 21-2880-CO

LEAH A. RUBIN-BURRASCA,
Defendant/Appellant,)
)
v.)
)
TREA 1560 CENTRAL)
AVENUE LLC,)
Plaintiff/Appellee.)
_____)

NOTICE OF APPEAL



NOTICE IS GIVEN that LEAH A. RUBIN-BURRASCA, Defendant/Appellant, appeals to the Second District Court of Appeals, the order of this court rendered on February 25th 2022. The nature of the order is a final order of eviction

02/25/2022 
Leah A. Rubin-Burrasca

Pro Se

Address: 1560 Central Ave #208

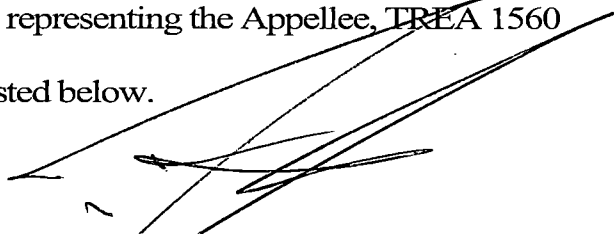
St. Petersburg FL 33705

E-mail address: penilayne411@gmail.com

Phone number: (954)706 6108

CERTIFICATE OF SERVICE

I, the undersigned, Harriett Rubin, hereby certify that on the 2nd day of March, 2022, the undersigned served a copy of the attached Notice of Appeal and accompanying Final Order on the parties representing the Appellee, TREA 1560 Central Avenue, LLC, at the addresses listed below.



(Signature)
Harriett Rubin
Harriett Rubin
10987 W. Broward Boulevard
Plantation, FL 33324
+1 (832) 400-3835
hrubin411@gmail.com

Mr. Michael Meade
TREA 1560 Central Avenue, LLC
1560 Central Avenue
St. Petersburg, FL 33705
(727) 502-5700
mmeade@zrsmanagement.com
Charles V. Barrett III, Esq.
307 Fielding Avenue
Tampa, FL 33606-4121
(813) 250-9797

FILED
MAR 02 2022
KEN BURKE
CLERK CIRCUIT COURT & COMPTROLLER

IN THE COUNTY COURT FOR PINELLAS COUNTY, FLORIDA
CASE NO. 21-2880-CO-41

TREA 1560 CENTRAL AVENUE LLC, a Delaware
limited liability company authorized to do business in
Florida, as landlord of FUSION 1560,
Plaintiff,

vs.

LEAH A. RUBIN-BURRASCA,
Defendant.

JUDGMENT FOR POSSESSION

THIS CAUSE came on for Final Hearing via Zoom at 11:00 a.m. on February 23, 2022. Both parties were present with counsel. The Court having heard testimony, taken evidence, heard argument from the parties, and being otherwise duly advised in the premises, it is

ORDERED AND ADJUDGED as follows:

1. Plaintiff and Defendant entered a lease agreement starting on November 21, 2018. The initial term of the lease ended on November 20, 2019, and the lease became a month-to-month lease.

2. Pursuant to the terms of the lease agreement, on March 16, 2021, Plaintiff served a notice of termination of month-to-month tenancy upon Defendant. The lease therefore ended on March 31, 2021.

3. Defendant raised the affirmative Defense of retaliatory eviction under Section 83.64, Florida Statutes, primarily alleging that she was being discriminated against for numerous complaints she made to the management staff and to code enforcement about the condition of her dwelling unit.

4. However, uncontradicted evidence was presented that Defendant owed approximately \$14,117.61 in back rent at the time of serving the lease nonrenewal notice. Additionally, Plaintiff's witness testified that the decision to terminate the lease was also based on Defendant's history of failure to cooperate with maintenance staff, discourteous

interactions with staff members, and a complaint from one of Plaintiff's commercial tenants, a bar, alleging that Defendant was throwing rocks at patrons.

5. Plaintiff has therefore established that good cause exists to terminate the tenancy. Under section 83.64(3), the Defendant is precluded from raising retaliation as an affirmative defense in this matter. That defense "does not apply when the landlord proves the eviction is for good cause, and further defines good cause to include 'violation of the rental agreement.'" *Salmonte v. Eilertson*, 526 So. 2d 179, 180 (Fla. 1st DCA 1988).


6. Furthermore, even if good cause did not exist to terminate the lease, Defendant has not met her burden to prove that the eviction action was based on discrimination or retaliation under section 83.64.

7. Plaintiff, TREA 1560 CENTRAL AVENUE LLC, a Delaware limited liability company authorized to do business in Florida, as landlord of FUSION 1560, does have and recover possession of the premises described as **1560 Central Avenue, Apt. #208, St. Petersburg, FL 33705**, from the Defendant.

8. The Clerk of the Court shall issue a Writ of Possession directed to the Sheriff of Pinellas County, Florida, directing the Sheriff to evict the Defendant from the subject premises and to place the Plaintiff in possession of same, for which let execution issue forthwith.

9. The Court reserves jurisdiction to enter such other orders and rulings as are appropriate in the circumstances.

DONE AND ORDERED, in Chambers, at Pinellas County, Florida, this ____ day of _____, 2022.


21-002880-CO 2/25/2022 1:04:27 PM
County Judge Susan Bedinghaus
21-002880-CO 2/25/2022 1:04:27 PM

COUNTY COURT JUDGE

COPIES FURNISHED TO:
CHARLES V. BARRETT, III, ESQUIRE
TIMOTHY P. DRISCOLL, ESQUIRE

EXHIBIT 2

- Appeal -



IN THE CIRCUIT/COUNTY COURT OF THE Sixth JUDICIAL CIRCUIT
IN AND FOR Pinellas COUNTY, FLORIDA

TREA 1560 Central Avenue LLC
Plaintiff/Petitioner or In the Interest of

CASE NO. 21-2880-CO

Leah A. Rubin-Burrisca
Defendant/Respondent

APPLICATION FOR DETERMINATION OF CIVIL INDIGENT STATUS

Notice to Applicant: If you qualify for civil indigence, the filing and summons fees are waived; other costs and fees are not waived.

1. I have 0 dependents. (Include only those persons you list on your U.S. Income tax return.)

Are you Married? Yes No Does your Spouse Work? Yes No Annual Spouse Income? \$ _____

2. I have a net income of \$ 0 paid weekly every two weeks semi-monthly monthly yearly other _____
(Net income is your total income including salary, wages, bonuses, commissions, allowances, overtime, tips and similar payments, minus deductions required by law and other court-ordered payments such as child support.)

3. I have other income paid weekly every two weeks semi-monthly monthly yearly other _____
(Circle "Yes" and fill in the amount if you have this kind of income, otherwise circle "No")

Second Job	Yes \$ _____	<input checked="" type="checkbox"/> No	Veterans' benefits	Yes \$ _____	<input checked="" type="checkbox"/> No
Social Security benefits	Yes \$ _____	<input checked="" type="checkbox"/> No	Workers compensation	Yes \$ _____	<input checked="" type="checkbox"/> No
For you	Yes \$ _____	<input checked="" type="checkbox"/> No	Income from absent family members	Yes \$ _____	<input checked="" type="checkbox"/> No
For child(ren)	Yes \$ _____	<input checked="" type="checkbox"/> No	Stocks/bonds	Yes \$ _____	<input checked="" type="checkbox"/> No
Unemployment compensation	Yes \$ _____	<input checked="" type="checkbox"/> No	Rental income	Yes \$ _____	<input checked="" type="checkbox"/> No
Union payments	Yes \$ _____	<input checked="" type="checkbox"/> No	Dividends or interest	Yes \$ _____	<input checked="" type="checkbox"/> No
Retirement/pensions	Yes \$ _____	<input checked="" type="checkbox"/> No	Other kinds of income not on the list	Yes \$ _____	<input checked="" type="checkbox"/> No
Trusts	Yes \$ _____	<input checked="" type="checkbox"/> No	Gifts	Yes \$ _____	<input checked="" type="checkbox"/> No

I understand that I will be required to make payments for costs to the clerk in accordance with §57.082(5), Florida Statutes, as provided by law, although I may agree to pay more if I choose to do so.

4. I have other assets: (Circle "yes" and fill in the value of the property, otherwise circle "No")

Cash	Yes \$ _____	<input checked="" type="checkbox"/> No	Savings account	Yes \$ _____	<input checked="" type="checkbox"/> No
Bank account(s)	Yes \$ <u>\$1,600</u>	<input checked="" type="checkbox"/> No	Stocks/bonds	Yes \$ _____	<input checked="" type="checkbox"/> No
Certificates of deposit or	Yes \$ _____	<input checked="" type="checkbox"/> No	Homestead Real Property*	Yes \$ _____	<input checked="" type="checkbox"/> No
Money market accounts	Yes \$ _____	<input checked="" type="checkbox"/> No	Motor Vehicle*	Yes \$ <u>2,000</u>	<input checked="" type="checkbox"/> No
Boats*	Yes \$ _____	<input checked="" type="checkbox"/> No	Non-homestead real property/real estate*	Yes \$ _____	<input checked="" type="checkbox"/> No
			Other assets*	Yes \$ _____	<input checked="" type="checkbox"/> No

Check one: I DO DO NOT expect to receive more assets in the near future. The asset is _____

5. I have total liabilities and debts of \$ _____ as follows: Motor Vehicle \$ 0, Home \$ _____, Boat \$ _____, Non-homestead Real Property \$ _____, Child Support paid direct \$ _____, Credit Cards \$ _____, Medical Bills \$ 10000, Cost of medicines (monthly) \$ _____, Other \$ Judgement & attorney fees \$20,000

6. I have a private lawyer in this case..... Yes No

A person who knowingly provides false information to the clerk or the court in seeking a determination of indigent status under s. 57.082, F.S. commits a misdemeanor of the first degree, punishable as provided in s. 775.082, F.S. or s. 775.083, F.S. I attest that the information I have provided on this application is true and accurate to the best of my knowledge.

Signed on February 25th 2022
1983

Signature of Applicant for Indigent Status
Print Full Legal Name Leah Aimee Rubin-Burrisca
Phone Number/s: 954 706 6108

Year of Birth _____ Last 4 digits of Driver License or ID Number _____
Email address: 5010

Address: 1560 Central Ave #208 St. Petersburg FL 33705
Address: Street, City, State, Zip Code

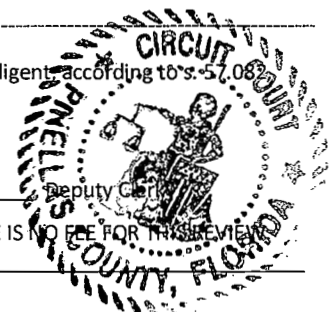
This form was completed with the assistance of: _____
Clerk/Deputy Clerk/Other authorized person.

CLERK'S DETERMINATION

Based on the information in this Application, I have determined the applicant to be Indigent () Not Indigent, according to s. 57.082

F.S. _____
Dated on FEB 25 2022, 20 _____

Muh
Clerk of the Circuit Court
By _____ Deputy Clerk



APPLICANTS FOUND NOT TO BE INDIGENT MAY SEEK REVIEW BY A JUDGE BY ASKING FOR A HEARING TIME. THERE IS NO FEE FOR THIS REVIEW.
Sign here if you want the judge to review the clerk's decision _____

EXHIBIT 3

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

TREA 1560 CENTRAL AVENUE LLC,
a Delaware limited liability company authorized
to do business in Florida, as landlord of FUSION
1560,

Plaintiff,

Case No.: 21-002880-CO-08
UCN: 522021CO002880XXCOCO

v.

LEAH A. RUBIN-BURRASCA,
Defendant.

ORDER DENYING DEFENDANT'S MOTION FOR WAIVER OF TRANSCRIPT FEES

THIS MATTER came before the Court on Defendant Leah A. Rubin-Burrasca's correspondence to the Chief Judge of the Sixth Judicial Circuit, received March 2, 2022, treated as a Motion for Waiver of Transcript Fees. Having reviewed the motion, the record, and applicable law, and the Court being fully advised in the premises, this Court finds that neither the Chief Judge nor the Court has authority to authorize the requested expenditure.

Therefore, it is

ORDERED that Leah A. Rubin-Burrasca's Motion for Waiver of Transcript Fees is **DENIED**.

DONE AND ORDERED on this 21 day of March 2022, in Chambers, at St. Petersburg, Pinellas County, Florida.



ANTHONY RONDOLINO
CHIEF JUDGE

Copies furnished to:

Charles V. Barrett, III, Esq.
Leah A. Rubin-Burrasca

EXHIBIT 4

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT, POST OFFICE BOX 327, LAKELAND, FL 33802-0327

May 25, 2022

CASE NO.: 2D22-0621

L.T. No.: 2021-CC-002880

LEAH A. RUBIN-BURRASCA

v.

TREA 1560 CENTRAL AVENUE, LLC

Appellant / Petitioner(s),

Appellee / Respondent(s).

BY ORDER OF THE COURT:

Appellant's motion for order (i) to compel Pinellas County Clerk to include in the record on appeal (and/or release copies to the parties of) video recordings of all electronic court proceedings and (ii) for an extension of time to file Appellant's initial brief is granted only to the extent that Appellant shall serve the initial brief within thirty days of the date of this order. The motion is otherwise denied. *See Lee County v. Eaton*, 642 So. 2d 1126 (Fla. 2d DCA 1994); *Lavin v. State*, 861 So. 2d 488, 490 n.1 (Fla. 4th DCA 2003). Failure to timely serve the initial brief will subject this appeal to dismissal without further notice.

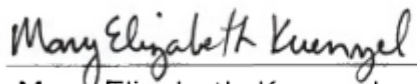
I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

Served:

CHARLES V. BARRETT, III, ESQ.
LEAH A. RUBIN-BURRASCA

TREA 1560 CENTRAL AVENUE, LLC
KEN BURKE, CLERK

ks



Mary Elizabeth Kuenzel
Clerk



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by me to Charles V. Barrett, III, Esq., and TREA 1506 Central Avenue LLC and Michael Meade by virtue of my filing the same with the Florida E-Filing Portal to all such parties this 12th day of July, 2022.

Leah A. Rubin-Burrasca

Signature

Leah A. Rubin-Burrasca

Pro Se

9079 4th Street North

St. Petersburg, FL 33702

+1 (954) 706-6108

penilayne411@gmail.com

RECEIVED, 08/15/2022 09:47:22 PM, Clerk, Second District Court of Appeal

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Appellant's

- (i) Notice to Invoke Discretionary Jurisdiction; and
- (ii) Memorandum in Support of Petition to Invoke

has been furnished by me to Charles V. Barrett, III, Esq., TREA 1506 Central Avenue LLC and Michael Meade by virtue of my filing the same with the Florida E-Filing Portal to all such parties this 15th day of August, 2022.

Leah A. Rubin-Burrasca

Signature

Leah A. Rubin-Burrasca
Pro Se
9079 4th Street North
St. Petersburg, FL 33702
+1 (954) 706-6108
penilayne411@gmail.com

CERTIFICATE OF COMPLIANCE FOR
COMPUTERGENERATED BRIEF Fla. R. App. P. 9.045
(complete this section if your brief was prepared on a computer)

I hereby certify that the aforesaid documents were prepared using *(choose one)* Bookman Old Style 14-point font *or* Arial 14-point font and that it complies with the word count requirements in the Florida Rules of Appellate Procedure

Leah A. Rubin-Burrasca

Signature

Leah A. Rubin-Burrasca

Printed name

Consult Florida Rule of Appellate Procedure 9.210 for information

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT, POST OFFICE BOX 327, LAKELAND, FL 33802-0327

May 25, 2022

CASE NO.: 2D22-0621
L.T. No.: 2021-CC-002880

LEAH A. RUBIN-BURRASCA

v. TREA 1560 CENTRAL AVENUE, LLC

Appellant / Petitioner(s),

Appellee / Respondent(s).

BY ORDER OF THE COURT:

Appellant's motion for order (i) to compel Pinellas County Clerk to include in the record on appeal (and/or release copies to the parties of) video recordings of all electronic court proceedings and (ii) for an extension of time to file Appellant's initial brief is granted only to the extent that Appellant shall serve the initial brief within thirty days of the date of this order. The motion is otherwise denied. *See Lee County v. Eaton*, 642 So. 2d 1126 (Fla. 2d DCA 1994); *Lavin v. State*, 861 So. 2d 488, 490 n.1 (Fla. 4th DCA 2003). Failure to timely serve the initial brief will subject this appeal to dismissal without further notice.

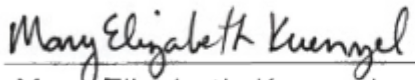
I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

Served:

CHARLES V. BARRETT, III, ESQ.
LEAH A. RUBIN-BURRASCA

TREA 1560 CENTRAL AVENUE, LLC
KEN BURKE, CLERK

ks



Mary Elizabeth Kuenzel
Clerk



SECOND DISTRICT COURT OF APPEAL OF FLORIDA
P.O. BOX 327
LAKELAND, FLORIDA 33802-0327
(863) 499-2290

August 16, 2022

Re:

Leah A. Rubin-Burrasca
v.
Trea 1560 Central Avenue, LLC
Appeal No.: 2D22-621
Trial Court No.: 2021-CC-002880
Trial Court Judge:

Florida Supreme Court
Attn: Clerk's Office

Attached is a certified copy of the notice invoking the discretionary jurisdiction of the Supreme Court, pursuant to Rule 9.120, Florida Rules of Appellate Procedure. Attached also is this Court's opinion or decision relevant to this case.

The filing fee prescribed by Section 25.241(2)(a), Florida Statutes, was paid through the portal.

The filing fee prescribed by Section 25.241(2)(a), Florida Statutes, was received by this court and is attached.

The filing fee prescribed by Section 25.241(2)(a), Florida Statutes, was not received by this court.

Petitioner/Appellant has been previously determined insolvent by the circuit court or our court in the underlying case.

Petitioner/Appellant has already filed, and this court has granted, petitioner/appellant's motion to proceed without payment of costs in this case.

No filing fee is required because:

- Summary Appeal, pursuant to rule 9.141
- From the Unemployment Appeals Commission
- A Habeas Corpus proceeding
- A Juvenile case
- Other

In criminal cases, the notice of appeal was filed in the lower tribunal on _____.

If there are any questions regarding this matter, please do not hesitate to contact this office.

Sincerely,

Mary Elizabeth Kuenzel
Clerk

By: Joshua Dannelley

MK: jd

cc (without attachments):
Charles V. Barrett, III, Esq.
Leah A. Rubin-Burrasca