

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

Judicial Section: CA25
Case No.: 2021-021307-CA-01

CITY OF OPA-LOCKA, FLORIDA,
a Florida Municipal corporation,

Plaintiff/Appellant,

v.

DADE COUNTY POLICE BENEVOLENT
ASSOCIATION et al,

Defendant(s)/Appellee(s).

NOTICE OF APPEAL

NOTICE IS GIVEN that Plaintiff, CITY OF OPA-LOCKA, pursuant to Rules 9.030(b)(1)(A) and 9.110(b) Florida Rules of Appellate Procedure, appeals to the Third District Court of Appeal, the Order Granting Non-Party Jerome Wolfson's Motion for Protective Order to Quash Plaintiff's Civil Subpoena rendered by Judge Valerie R. Manno Schurr, of the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida, on January 26, 2024.

A conformed copy of the Order is attached to this Notice as Exhibit "A." The nature of the order appealed is a final order of the Circuit Court of the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida, that grants Non-Party Jerome Wolfson's Motion for Protective Order.

Respectfully submitted this 19th day of February, 2024.

By: **BURNADETTE NORRIS-WEEKS, P.A.**
Burnadette Norris-Weeks, Esq.
Florida Bar No. 0949930
Attorneys for City of Opa-Locka, Florida
401 North Avenue of the Arts (NW 7th Avenue)
Fort Lauderdale, Florida 33311
Telephone: (954) 768-9770

STATE OF FLORIDA, COUNTY OF MIAMI-DADE
I HEREBY CERTIFY THAT THE FOREGOING IS A TRUE AND CORRECT COPY OF THE
ORIGINAL ON FILE IN THIS OFFICE 2-20 AD 20 24
JUAN FERNANDEZ-BARQUIN, Clerk of the Court and Comptroller, Miami-Dade County

Deputy Clerk

[Signature]
208836



Fax: (954) 768-9790
Email: bnorris@bnwlegal.com
paralegal@bnwlegal.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of February 2024, a true and correct copy of the foregoing was filed and has been furnished by electronic service to all Counsel of Record as they appear on the attached Service List below.

/s/ Burnadette Norris-Weeks
Burnadette Norris-Weeks
City Attorney
Florida Bar No. 0949930

SERVICE LIST

Andrew R. Ingalls, Esq.
396 Alhambra Circle
North Tower, 14th Floor
Miami, FL 33134
305-373-4032 - Office
305-351-8446 - Facsimile
Email: aingalls@daypitney.com

Rhea P. Grossman, Esq.
2650 W. State Road 84, Suite 102
Fort Lauderdale, FL 33312
954-587-8488 - Office
561-866-8355 - Mobile
954-587-7675 - Facsimile
Email: rheagrossman@comcast.net

Daniel Vazquez, Esq.
10680 N.W. 25th Street
Suite 205
Doral, FL 33172
305-593-0044
Email: daniel@dcpba.org

EXHIBIT "A"

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

CASE NO: 2021-021307-CA-01
SECTION: CA25
JUDGE: Valerie R. Manno Schurr

City of Opa-Locka, Florida

Plaintiff(s)

vs.

Jerome Wolfson et al

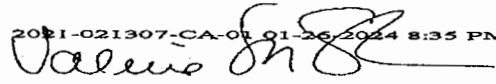
Defendant(s)

**[PROPOSED] ORDER ON NON-PARTY JEROME WOLFSON'S MOTION FOR
PROTECTIVE ORDER TO QUASH PLAINTIFF'S CIVIL SUBPOENA**

THIS CAUSE having come before the Court at hearing on January 9, 2024, and January 19, 2024, on Non-Party Jerome Wolfson's Motion for Protective Order to Quash Plaintiff's Civil Subpoena filed August 30, 2023 (the "Motion"), and the Court, being fully advised in the premises, having reviewed the record, the briefing, and having heard argument of counsel, it is hereby:

ORDERED AND ADJUDGED that the Motion is **GRANTED** for the reasons stated on the record. Ruling on Wolfson's request for the attorney's fees, costs, and other reasonable expenses incurred in connection with the Motion is **DEFERRED**.

DONE and ORDERED in Chambers at Miami-Dade County, Florida on this 26th day of January, 2024.

2021-021307-CA-01 01-26-2024 8:35 PM

2021-021307-CA-01 01-26-2024 8:35 PM
Hon. Valerie R. Manno Schurr
CIRCUIT COURT JUDGE
Electronically Signed

No Further Judicial Action Required on **THIS MOTION**

CLERK TO **RECLOSE** CASE IF POST JUDGMENT

Electronically Served:

Andrew Ingalls, aingalls@daypitney.com
Andrew Ingalls, athomsen@daypitney.com
Burnadette Norris-Weeks, bnorris@apnwplaw.com
Burnadette Norris-Weeks, paralegal@bnwlegal.com
Candice Cobb, ccobb@apnwplaw.com
Jordan Gary, jgary@apnwplaw.com
Laritza Orozco, orozcol@kleinpark.com
Mark J. Sullivan, mark@thetinstmanlawfirm.com
Mark J. Sullivan, tere@thetinstmanlawfirm.com
Michelle Austin Pamies, maustin@apnwplaw.com
RHEA P GROSSMAN MS, rheagrossman@comcast.net

Physically Served: