

**STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION**

JPM WESTBROOK I LIMITED PARTNERSHIP,

FHFC Case No. 2013-044BP

v. Petitioners,

FLORIDA HOUSING FINANCE CORPORATION,

Respondent

MOTION TO CONSOLIDATE

Respondent Florida Housing Finance Corporation (“Florida Housing,”) files this Motion to Consolidate pursuant to R. 28-106.108, Fla. Admin. Code, and respectfully requests consolidation of the above-styled case with the following cases now pending in this forum, and says:

Rosedale Holdings, LLC, et al. v. Florida Housing Finance Corporation v. Florida Housing Finance Corporation, FHHC Case No. 2013-038BP

OCDC Palm Village, LP, et al v. Florida Housing Finance Corporation v. Florida Housing Finance Corporation, FHHC Case No. 2013-042BP

Frenchtown Square, LLC, v. Florida Housing Finance Corporation v. Florida Housing Finance Corporation, FHHC Case No. 2013-043P

Summerset Apartments, Limited Partnership v. Florida Housing Finance Corporation v. Florida Housing Finance Corporation, FHHC Case No. 2013-044BP

1. All referenced parties timely filed petitions challenging preliminary agency action of Florida Housing Finance Corporation’s Board of Directors regarding the funding of Applications under Request for Applications (RFA) 2013-001, a competitive solicitation subject to the provision of §120.57(3), Fla. Stat. (2013). Per the terms of this

FILED WITH THE CLERK OF THE FLORIDA HOUSING FINANCE CORPORATION

 /DATE: 02/06/14

RFA, the substantial interests of the above Petitioners may be affected by the outcome of the related cases.

2. The above-referenced cases also involve substantially similar issues of law and the Respondent is identical in all above-referenced cases. The result in each of the cases may very well affect the ultimate result in the others. Consolidation would promote the just, speedy, and inexpensive resolution of the proceedings, and would not unduly prejudice the rights of any party. Consolidation would also preclude inconsistent results within the set of cases arising under this competitive solicitation.

3. Undersigned counsel has consulted with counsel for Petitioner and is authorized to state that the parties are not opposed to this Motion to Consolidate.

4. Florida Housing will contemporaneously file Motions to Consolidate on the above related cases.

WHEREFORE, Respondent respectfully requests that the Honorable Hearing Officer issue an order consolidating the above-referenced matters into a single proceeding.

Respectfully submitted this *6th* day of February, 2014.



A handwritten signature in blue ink, appearing to read "Wellington H. Meffert II".

Wellington H. Meffert II
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail and by electronic mail, to: Michael P. Donaldson, Esq., mdonaldson@carltonfields.com, Carlton Fields, P.A., P.O. Drawer 190, Tallahassee, Florida 32302; to J. Stephen Menton, Esquire, Rutlege Ecenia & Purnell P.A., smenton@reuphlaw.com, 119 South Monroe Street, Suite 202, Tallahassee, Florida 32301; Lawrence E. Sellers, Esq., larry.sellers@hklaw.com, and Karen D. Walker, Esq., karen.walker@hklaw.com, Holland and Knight LLP., 315 S. Calhoun St., Suite 600, Tallahassee, FL 32301., Michael G. Maida, Esq., mike@maidawpa.com, Michael G. Maida, P.A., 1709 Hermitage Blvd., Suite 201, Tallahassee, Florida 32308., and to Douglas Manson, Esq., dmanson@mansonbolves.com, and Craig Varn, Esq., cvarn@mansonbolves.com, Manson & Bolves P.A., 1101 West Swan Avenue, Tampa, Florida 33606., Derek Bruce, Esq., dbruce@gunster.com, Gunster, 200 North Orange Ave., Suite 1400, Orlando, Florida 32801, Joseph Goldstein, Esq., jgoldstein@shutts.com, Shutts & Bowen LLP, 200 East Broward Boulevard, Suite 2100, Fort Lauderdale, Florida 33301, and to Gary Cohen, Esq., gcohen@shutts.com, Shutts & Bowen LLP, 201 S. Biscayne Blvd., 1500 Miami Center, Miami, FL 33131, this 28th day of January, 2014.



Wellington H. Meffert II
Counsel for Respondent