

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

CA FLORIDA HOLDINGS, LLC,
Publisher of *THE PALM BEACH POST*,
Plaintiff,

v.

DAVE ARONBERG, as State Attorney of
Palm Beach County, Florida; SHARON R.
BOCK, as Clerk and Comptroller of Palm
Beach County, Florida,

Defendants.

**PLAINTIFF CA FLORIDA HOLDINGS, LLC MOTION TO SCHEDULE A ONE HOUR
HEARING FOR ITS MOTION FOR SUMMARY JUDGMENT**

Plaintiff, CA Florida Holdings, LLC, publisher of *The Palm Beach Post*, moves for an order scheduling its Motion for Summary Judgment and states:

1. Plaintiff CA Holdings, LLC., was the publisher of The Palm Beach Post newspaper (the “PBP”), the largest daily circulation newspaper in Palm Beach County, Florida. PBP brings this action seeking the release of the Jeffrey Epstein grand jury materials in the possession of the Clerk of the Court, Palm Beach County.
2. As the court is well aware, Jeffrey Epstein (“Epstein”) was convicted of a sexual felony as part of a plea bargain between Epstein, the Palm Beach State Attorney and the U.S. Attorney for the Southern District of Florida.
3. Investigations by PBP and other media exposed the favorable plea deal which allowed Epstein to avoid prosecution for serious sexual felonies involving minors. Epstein also received lenient treatment through a work-release program which he used to continue his sexual abuse of

minors. Epstein, following these revelations, was eventually charged by the U.S. Attorney for the Southern District of New York with additional multiple counts of sexual abuse of minors. While in pre-trial detention, Epstein committed suicide.

4. In order to inform the public as to why the Palm Beach State Attorney treated Epstein so favorably, PBP filed this lawsuit for the release and access to Palm Beach County's Epstein grand jury materials.

5. This case involves novel issues of first impression relating to the operation of Florida grand juries, grand jury secrecy and the media's First Amendment right to obtain criminal prosecution materials to inform the public

6. Because of these important public issues, PBP requests that this Court specially set PBP's motion for summary judgment for at least a (1) one-hour non-evidentiary hearing.

7. The exhibits supporting PBP's motion for summary judgment are voluminous and require time to review. Ample time is necessary for the Court to address the possible remedies to balance the competing interests.

8. PBP also requests that its motion for summary judgment be heard at the Court's earliest convenience given the importance of the issues presented.

9. PBP has advised counsel for the Clerk of the Court about this motion and the relief requested herein. Though PBP has repeatedly asked whether the Clerk opposes or consents to the relief requested, the Clerk has not stated his position.

10. Therefore, PBP has shown good cause for the Court to schedule at least a one hour hearing.

WHEREFORE, PBP respectfully requests that the Court specially set PBP's motion for summary for at least one hour, and schedule a hearing at the Court's earliest convenience, as well as grant such other and further relief that the Court may deem just and proper.

Respectfully submitted,

GREENBERG TRAURIG, P.A.

*Attorneys for CA Florida Holdings, LLC,
Publisher of The Palm Beach Post*

Stephen A. Mendelsohn, Esq.
401 East Las Olas Blvd., Ste. 2000
Fort Lauderdale, Florida 33301
Telephone: (954) 768-8225
Facsimile: (561) 338-7099

By: /s/ Stephen A. Mendelsohn
STEPHEN A. MENDELSON
Florida Bar No. 849324
mendelsohns@gtlaw.com
smithl@gtlaw.com
FLService@gtlaw.com

By: /s/ Michael J Grygiel
MICHAEL J. GRYGIEL
(Admitted *Pro Hac Vice*)
54 State St., 6th Floor
Albany, New York 12207
Telephone: (518) 689-1400
Facsimile: (518) 689-1499
grygielm@gtlaw.com

By: /s/ Nina D. Boyajian
NINA D. BOYAJIAN
(Admitted *Pro Hac Vice*)
1840 Century Park East, Ste. 1900
Los Angeles, California 90067
Telephone: (310) 586-7700
Facsimile: (310) 586-7800
boyajiam@gtlaw.com
riveraal@gtlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of May, 2021, a true and correct copy of the foregoing has been filed with the Clerk of the Court using the State of Florida e-filing system, which will send a notice of electronic service for all parties of record herein

/s/ Stephen A. Mendelsohn

STEPHEN A. MENDELSON

ACTIVE 57206934v2

NOT A CERTIFIED COPY