

No.: 23-673

In the

SUPREME COURT of the UNITED STATES

In Re: JEFFREY LANCE HILL, SR.

On Petition for Writ of Mandamus to David J.
Smith, Clerk of Court for the United States Court of
Appeals for the Eleventh Circuit.

PETITION FOR REHEARING

Jeffrey Lance Hill, Sr.

Petitioner Pro Se

908 SE Country Club Road

Lake City, Florida 32025

Phone: 386-623-9000

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PETITION FOR REHEARING

Pursuant to United States Supreme Court Rule 44, Petitioner Jeffrey Lance Hill, Sr. (Hill) respectfully petitions this Court to rehear its February 20, 2023 decision to deny Hill's Petition for Writ of Mandamus. This Petition is timely filed within 25 days of the denial.

PRELIMINARY STATEMENT

In this Petition for Rehearing, exhibits for this Petition will be referred to as RH ____.

I. SUBSTANTIAL GROUNDS NOT YET ARGUED

a. The United States Court of Appeals for the Eleventh Circuit, by direction of the court, by and through its Clerk David J. Smith, dismissed Hill's appeal number 23-12231-D pursuant to local rule 42-1 (b), on August 23, 2023 (effective August 24, 2023), see Exhibit RH-1.

b. The dismissal is extremely prejudicial and discriminates Hill. Hill is a lifelong resident and landowner in the state of Florida. This issue is of public importance because if Hill owns land anywhere in the Ninth Federal Circuit; Alaska, Arizona, California, Guam, Hawaii, Idaho, Montana, Nevada, Oregon, Washington, and the

Northern Mariana Islands, Hill's appeal could not have been dismissed for failure to file an appendix. The Ninth Circuit's local Rule 30-1.1 requires the parties to file excerpts of the record instead of the Appendix prescribed by FRAP 30, see Exhibit RH-2. Further, the Ninth Circuit's local rule 30-1.3 provides that no excerpts are required by Pro Se parties, see Exhibit RH-2. Hill is not a lawyer and files pro se, therefore, if Hill owned land in the Ninth Federal Circuit, he is not required to file an Appendix at all. The dismissal is not consistent with the intent and purpose of the Rules of Appellate Procedure. Hill's opening brief in appeal no.: 23-12231-D refers to the record only, his opening brief does not refer to the Appendix whatsoever, see Exhibit RH-3 through RH-23. The Eleventh Circuit Court has the entire record provided to them by the United States District Court, Middle District of Florida, Jacksonville Division. An Appendix required of Hill is simply redundant. Access to our courts and the rules of procedure must apply equally to all citizens of the United States. Private property rights should be equally protected in all fifty states, U.S. Territories and the District of Columbia. If the dismissal of Hill's appeal is allowed to stand, landowner's rights are not equally protected. The 14th Amendment guarantees equal protection.

c. The dismissal of Hill's appeal by the Eleventh Circuit Court implies that a state agency can take

private property without just compensation and allows a magnificent overreach by government. The farm taken is USDA Farm number 2102, which has peanut, wheat and corn allotments. There are 212 acres involved in this taking.

d. The dismissal does not contain the names of the judges of the Eleventh Circuit who may have been involved in the dismissal, the Order of Dismissal simply reads "FOR THE COURT BY DIRECTION"; see Exhibit RH-1.

e. The dismissal by the Eleventh Circuit Clerk allows the District Court to deny Hill trial by jury which was demanded in Hill's Complaint (No.: 3:20-cv-0895). The facts have not been determined.

f. The dismissal leaves opinions of the Florida State Court standing when the opinions are void per se and void ab initio. The Florida State Court fined Hill \$100,000.00 although there is no Florida law prescribing such fine.

CONCLUSION

This Petition for Rehearing should be granted.
Respectfully submitted on this 13th day of March,
2024 by Jeffrey Lance Hill, Sr.;
Jeffrey Lance Hill, Sr., Petitioner pro se, 908 SE
Country Club Road, Lake City, Florida 32025;
Phone: 386-623-9000

RH-1

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

No.: 23-12231-D

JEFFREY LANCE HILL, SR., individually;
Aggrieved Party and Real Party in Interest of El
Rancho No Tengo, Inc.,

Plaintiff-Appellant,

Versus

LEANDRA G. JOHNSON, individually and
officially, GREGORY S. PARKER, individually and
officially, WILLIAM F. WILLIAMS, III, individually
and officially, individually and as Columbia County
attorney, JENNIFER B. SPRINGFIELD, et al,
Defendants/Appellees

Appeal from the United States District Court, for the
Middle District of Florida

ORDER: Pursuant to the 11th Cir. R. 42-1(b), this
appeal is dismissed for want of prosecution because
appellant Jeffrey Lance Hill, Sr. failed to file an
appendix within the time fixed by the rules, effective
August 24, 2023.

DAVID J. SMITH

Clerk of the United States Court of Appeals for the
Eleventh Circuit FOR THE COURT BY
DIRECTION

Ninth Circuit Rule 30.1-1. Purpose

The Ninth Circuit requires the parties to file Excerpts of Record instead of the Appendix prescribed by FRAP Rule 30. The primary purpose of the excerpts is to compile for the Court all parts of the record, but only those parts of the record that are relevant and useful to the Court in deciding the appeal.

For purposes of these rules, the terms “Excerpts” and “Excerpts of Record” refer to any type of excerpts submitted by any party, including Supplemental Excerpts and Further Excerpts.

30-1.3. No Excerpts Required for Pro Se Party

A party proceeding without counsel need not file excerpts. If such a party does not file excerpts, counsel for appellee or respondent must file Supplemental Excerpts of Record that contain all of the documents that are cited in the pro se opening brief or otherwise required by Rule 30-1.4, as well as the documents that are cited in the answering brief.

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No.: 23-12231-D

UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

JEFFREY LANCE HILL, SR., etc

Appellant(s),

v.

LEANDRA G. JOHNSON, Individually and
Officially, et al,

Appellees.

On Appeal from the United States District Court,
Middle District of Florida, Jacksonville Division

INITIAL BRIEF of Appellant Jeffrey Lance Hill,
Sr.

Jeffrey Lance Hill, Sr.
Appellant pro se
908 SE Country Club Rd.
Lake City, FL 32025
Phone: 386-623-9000

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U.S. COURT OF APPEALS FOR THE ELEVENTH
CIRCUIT

CERTIFICATE OF INTERESTED PERSONS AND
CORPORATE DISCLOSURE STATEMENT (CIP)

Jeffrey L. Hill, Sr. vs. Leandra Johnson, et al.
Appeal No. 23-12231-D 11th Cir. R. 26.1-1(a)
requires the appellant or petitioner to file a
Certificate of Interested Persons and Corporate
Disclosure Statement (CIP) with the court within 14
days after the date the case or appeal is docketed in
this court, and to include a CIP within every motion,
petition, brief, answer, response, and reply filed.
Also, all appellees, intervenors, respondents, and all
other parties to the case or appeal must file a CIP
within 28 days after the date the case or appeal is
docketed in this court. You may use this form to
fulfill these requirements. In alphabetical order,
with one name per line, please list all trial judges,
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, parent
corporations, any publicly held corporation that
owns 10% or more of the party's stock, and other
identifiable legal entities related to a party.

(please type or print legibly):

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CIP Continued

Jeffrey L. Hill, Sr.

Linda P. Hill, 908 SE Country Club Rd., Lake City,
FL 32025

Jeffrey L. Hill, Jr., 908 SE Country Club Rd., Lake
City, FL 32025

Joshua S. Hill, 908 SE Country Club Rd., Lake
City, FL 32025

Jolene M. Hill, 908 SE Country Club Rd., Lake
City, FL 32025

Megan L. Hill, 908 SE Country Club Rd., Lake
City, FL 32025

Hunter Ray Hill, 908 SE Country Club Rd., Lake
City, FL 32025

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No.: 23-12231-D

STATEMENT REGARDING ORAL ARGUMENT

Appellant believes the pertinent authority and facts are adequately presented in this brief for decision which does not need oral argument; however, should this Honorable Court find oral argument is necessary, Appellant agrees.

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STATEMENT OF JURISDICTION

In this action, the United States District Court had jurisdiction under Title 28 U.S.C. sections 1331 and 1343; Title 42 sections 1982, 1983, 1985 and the United States Constitution Amendments V, VII, VIII and XIV.

Appellant timely filed Notice of Appeal on July 6, 2023; therefore, this Appeal is timely filed.

This appeal is from a final order of the United States District Court and is appealable.

This court has jurisdiction pursuant to Title 28 U.S.C. sections 1294 and 2201.

ISSUES ON APPEAL

1. Whether granting immunity to three judges in this action constitutes a judicial taking in violation of Amendment V of the United States Constitution as applied to the states by Amendment XIV of the United States Constitution.
2. Whether the \$100,000.00 fine awarded to Suwannee River Water Management District by Leandra G. Johnson violated Amendment VIII of the United States Constitution.
3. Whether res judicata is applicable in this matter when the essential elements do not exist.
4. Whether a Rule 12 (b) (6) dismissal is appropriate when it constitutes a land taking without just compensation.
5. Whether the lower court erred when denying Appellant's Motion for Leave to file Supplemental Pleadings when the denial allows Defendants to take and use Appellant's real and personal property without compensation.
6. Under Florida law, whether William F. Williams, III was duly authorized to preside in

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Columbia County, Florida as a state circuit court judge in cases involving Appellant's property.

7. Whether Columbia County, Florida was lawfully authorized to place Appellant's property in receivership.

STATEMENT OF THE CASE

Appellant Jeffrey Lance Hill, Sr. filed a complaint in this matter on August 7, 2020 with demand for jury trial, Doc. 1.

The U. S. District Court dismissed the complaint applying Rooker-Feldman, Doc. 44.

This Court vacated and remanded the District Court's dismissal, Doc. 54.

Appellees filed renewed Motions to Dismiss. Appellant filed Responses to the renewed motions, Docs. 58 – 70.

After seven months without decision, the District Court dismissed the complaint, Doc.71.

This appeal involves the dismissal by the District Court, without determination of fact, without opportunity for Appellant to show proof, by and through granting immunity to the three defendants who are Florida State Court judges. Two of which are Florida Circuit Court judges and one of which was a county judge. Also, this appeal involves the District Court's order granting Defendants'/ Appellees' Renewed Motions to Dismiss on the

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grounds of res judicata and the District Court's denying Plaintiff/Appellant's Request for Leave to file Supplemental Pleadings, Doc. 57, opining that amendment is futile, would cause undue delay and prejudice and the Defendants would be subject to the burden of additional litigation.

SUMMARY OF ARGUMENT

- I. The elements necessary for res judicata do not exist in this matter.
- II. Judges do not possess immunity to take property without just compensation.
- III. Columbia County, Florida had no lawful authority to place Appellant's property in receivership.
- IV. William F. Williams, III was not a duly authorized Florida Circuit Court judge for Columbia County, Florida when he rendered his opinions in state court cases nos.: 11-340-CA and 17-132-CA.
- V. In the interest of justice, The District Court should have granted leave to file Appellant's supplemental pleadings (Doc. 57).

ARGUMENT I: res judicata

There are four essential elements for a court to apply res judicata, according to the order appealed here (Doc. 71, page 894). The District Court finds; “Both the 2015 and 2017 cases included judgments on the merits, rendered by courts of competent jurisdiction, included the same parties and involved the same causes of action” (Doc. 71, Page 896). Such a finding is impossible because Columbia County, Florida and the City of Lake City, Florida and did not enter the controversy until April 7, 2017 (County enters); June 14, 2017 (City enters); Doc. 1, pages 5 & 6. Such finding is clear error. The 2017 claims could not possibly have been sued upon in the 2015 case. Further, Suwannee River Water Management District continues to flood Appellant’s land in section 4, Columbia County, Florida (Doc. 57, page 529) creating new causes of action.

Positively, the causes or action are different and parties are different. Also, there has not been any adjudication of whether the \$100,000.00 fine awarded to Suwannee River Water Management

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District by Leandra G. Johnson violated Amendment VIII of the United States Constitution. There has been no judgment on the merits concerning the \$100,000.00 fine being unconstitutional.

Res judicata should not be and has never been a vehicle to take property without compensation. The lower courts have not ruled on the validity of the \$100,000.00 fine (Doc. 1, page 8-9); the validity of Leandra G. Johnson's order demanding a permit be obtained to replace a pipe (Doc. 1, page 8); the validity of Gregory S. Parker's order for Appellant to pay \$280,376.20 for attorneys fees (Doc. 1, page 9-10); or the validity of the deed Suwannee River Water Management District obtained by and through those orders (Doc. 1, page 10) . These issues have been raised. Appellant's Constitutional Rights remain unremedied in this matter.

ARGUMENT II: judicial immunity

The District Court finds that Counts I, II, III, and IV are due to be dismissed on judicial immunity. The

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United States Supreme Court holds: “ It is absurd to allow a state to do by judicial decree what the Takings Clause forbids it to do by legislative fiat”; see *Stop the Beach Renourishment v. Florida Dept. of Environmental Protection*, 560 U.S. 702 (2010). *Stop the Beach* is cited in *Hill v. Suwannee River Water Management District*, 217 So. 3d 1100 (Fl 1st DCA 2017).

When the District Court grants immunity to judges and dismisses without determination of fact, it is allowing those judges to disregard the United States Supreme Court’s supervision in *Stop the Beach* and Amendment V of the United States Constitution. Judges are not above the law.

“But a void act is neither a law or a command. It is a nullity. It confers no authority. It affords no protection”; *Hopkins v. Clemson*, 221 U.S. 336 (1911). *Hopkins* is cited in *State Road Dept. v. Tharp* (Fla. Supreme Court 1931). “There is no immunity when private property has been taken”; *SRD v. Tharp*.

The District Court cites several cases in its decision, none are land takings. The judges actions are void for the reasons stated in the complaint (Doc.1).

ARGUMENT III: receivership & judicial immunity

The District Court finds that Hill has alleged enough to establish standing at this stage; Doc. 71, page 896. Also, the District Court finds that Hill has still failed to state a cognizable claim against Smallridge; Doc. 71 page 896. Appellant has standing in this matter because he has stated a cognizable claim.

The District Court cites *Barton v. Barbour*, 104 U.S. 126 (1881) in this appealed decision. *Barton* is not a private property takings claim, it is a claim for personal injury on a railroad against a duly authorized receiver. The District Court finds Smallridge is protected by judicial immunity; Doc. 71, page 897. Smallridge has no judicial immunity because he is not a duly authorized receiver.

Columbia County, Florida (County) lacked authority to place Appellant's private property in receivership

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(Doc. 35). County claims to be acting pursuant to Florida Statute 367.165 when petitioning for the receivership (Doc. 4-4). Florida Statute 367.165 does not apply to the state forcing a county to take its property or private property. Suwannee River Water Management District claims ownership of Appellant's private property and admits they are not under the purview of F. S. 367.165 (Doc. 4-4).

ARGUMENT IV: the Receivership

The alleged judge who assigned receivership to Smallridge, William F. Williams, III, (Williams) was not a duly authorized judge: see Florida Statutes 26.57, 26.012 and 34.01. Therefore, the receivership is per se void. The District Court cites two cases to explain Williams' status as a state circuit judge, *Judges of Polk County* and *Physicians HealthCare* (Doc. 71, page 893). Neither of those cases elevated a county judge to serve as a state circuit judge. *Judges of Polk County* involved a county judge to serve as county judge in another county. *Physicians Healthcare* involved a senior state circuit judge to

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serve as state circuit judge. The District Court misinterprets and misplaces the words; “service for which the judge is qualified” (Doc., 71, page 893). Williams is not qualified under Florida law to serve as a state circuit judge in Columbia County, Florida. Williams’ territorial jurisdiction lies in Lafayette County, Florida. Smallridge is not a duly authorized receiver to take private property from Appellant, therefore, he does not possess judicial immunity. Acting under color of law (Doc. 71, Page 898) means acting in contravention of the law. Because Smallridge is personally receiving money from Appellant’s property and he is not a duly authorized receiver, he must be individually culpable.

ARGUMENT V: supplemental pleadings

Immediately after this court vacated the previous dismissal (Doc. 54), Appellant filed a request for leave to file supplemental pleadings (Doc. 57) on September 12, 2022. Nine months later, on June 9, 2023, the District Court denied Appellant’s request (Doc. 71, page 902). The denial allows continuing

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violations of Amendment V of the United States Constitution and continues to disregard the very long line of precedent set by the United States Supreme Court in *Cedar Point Nursery v. Hassid*, 594 U.S. __ (2021); *Knick v. Township of Scot*, 588 U.S. __ (2019); *Horne v. Dept. of Agriculture*, 576 U.S. __ (2015); *Koontz v. Saint Johns River Water Management District*, 570 U.S. 595 (2013); *Arkansas Game and Fish Comm. v. U.S.*, 568 U.S. 23 (2012); *Stop the Beach Renourishment v. Fla. Dept. of Environmental Protection*, 560 U.S. 702 (2010); *Tahoe Sierra Preservation Council, Inc. v. Tahoe Regional Planning Agency*, 535 U.S. 302 (2002); *Palozzolo v. Rhode Island*, 533 U.S. 606 (2001); *City of Monterey v. Del Monte Dunes At Monterey*, 526 U.S. 687 (1998); *Dolan v. City of Tigard*, 512 U.S. 374 (1994); *Lucas v. South Carolina Coast Council*, 505 U.S. 1003 (1992); *First English Evangelical Lutheran Church of Glendale v. County of Los Angeles*, 482 U.S. 304, 315 (1987); *Nollan v. California Coastal Comm.*, 483 U.S. 825 (1987); *Loretto v. Teleprompter Manhattan*, 458 U.S.

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419 (1982); *Pruneyard Shopping Center v. Robins*, 447 U.S. 74 (1980); *Webb's Fabulous Pharmacies Inc. v. Beckwith*, 449 U.S. 155 (1980); *Kaiser Aetna v. U. S.*, 444 U.S. 164 (1979); *Penn Central Transportation Co. v. New York City*, 438 U.S. 104 (1978); *United States v. Dow*, 357 U.S. 17 (1958); *Seaboard Air Line Ry. Co. v. U. S.*, 261 U.S.299, 305, 306 (1923) and *Hopkins v. Clemson*, 221 U.S. 336 (1911). The per se rule is; The government must pay for what it takes.

CONCLUSION

For the reasons above and to end controversy, this Honorable Court should vacate the order rendered on June 9, 2023, by the United States District Court, remand for jury trial, and grant leave to Appellant for supplemental pleadings or grant the relief requested in Appellant Jeffrey Lance Hill, Sr.'s Complaint.

Respectfully submitted on this 10th day of August, 2023; Jeffrey L. Hill, Sr., Jeffrey Lance Hill, Sr., Appellant pro se, 908 SE Country Club Road, Lake City, Florida 32025; Phone: 386-623-9000.

CERTIFICATE OF UNREPRESENTED PARTY

I hereby certify that this Petition for Rehearing is restricted to the grounds in Supreme Court Rule 44, is presented in good faith, in the interest of justice and not for delay.

Executed on this 13th day of March, 2024;

Jeffrey L. Hill, Sr., Jeffrey Lance Hill, Sr.,
908 SE Country Club Road, Lake City, Florida
32025; Phone: 386-623-9000.

CERTIFICATE OF WORD COUNT

Pursuant to Supreme Court Rule 33.1(h), I hereby that the foregoing Petition for Rehearing is in compliance with Supreme Court Rule 33.1(g) and the petition contains 580 words.

Jeffrey L. Hill, Sr. Jeffrey Lance Hill, Sr.,
Petitioner pro se, 908 SE Country Club Road, Lake
City, Florida 32025; Phone: 386-623-9000.

CERTIFICATE OF SERVICE

I hereby certify that three true and correct copies of the foregoing Petition for Rehearing have been furnished by U.S. Mail, postage prepaid to the following: David J. Smith, Clerk of Court of the United States Court of Appeals for the Eleventh Circuit at 56 Forsyth Street N.W., Atlanta Georgia 30303; Timothy L. Newhall, attorney for Appellees Johnson, Parker and Williams at PL-1, the Capital, 400 South Monroe St., Tallahassee Florida 32399; Dale A. Scott, attorney for Appellee Columbia County, Florida at 2707 East Jefferson St., Orlando, Florida 32803; Jennifer B. Springfield, Appellee at 806 NW 16th Avenue, Gainesville, Florida 32601; David C. Willis, attorney for Appellee Suwannee River Water Management District at P.O. Box 1873, Orlando, Florida 32802 and Susan S. Erdelyi, attorney for Appellees City of Lake City, Florida, Joel F. Foreman and Michael Smallridge at 1200 Riverplace Blvd., Ste. 800, Jacksonville, Florida 32207. All parties required to be served have been served; Jeffrey L. Hill, Sr.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 13, 2024.

Jeffrey L. Hill, Sr., Jeffrey Lance Hill, Sr.