

**STATE OF FLORIDA  
FLORIDA HOUSING FINANCE CORPORATION**

FRENCHTOWN SQUARE,

FHFC Case No. 2013-043BP

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

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

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 provisions 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 6<sup>th</sup> day of February, 2014.



---

Wellington H. Meffert II  
General Counsel  
Fla. Bar No.: 0765554  
Florida Housing Finance Corporation  
227 North Bronough Street, Ste. 5000  
Tallahassee, FL 32301-1329  
850/488-4197  
[wellington.meffert@floridahousing.org](mailto:wellington.meffert@floridahousing.org)

### 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](mailto: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](mailto:smenton@reuphlaw.com), 119 South Monroe Street, Suite 202, Tallahassee, Florida 32301; Lawrence E. Sellers, Esq., [larry.sellers@hklaw.com](mailto:larry.sellers@hklaw.com), and Karen D. Walker, Esq., [karen.walker@hklaw.com](mailto:karen.walker@hklaw.com), Holland and Knight LLP., 315 S. Calhoun St., Suite 600, Tallahassee, FL 32301., Michael G. Maida, Esq., [mike@maidlawpa.com](mailto:mike@maidlawpa.com), Michael G. Maida, P.A., 1709 Hermitage Blvd., Suite 201, Tallahassee, Florida 32308., and to Douglas Manson, Esq., [dmanson@mansonbolves.com](mailto:dmanson@mansonbolves.com), and Craig Varn, Esq., [cvarn@mansonbolves.com](mailto:cvarn@mansonbolves.com), Manson & Bolves P.A., 1101 West Swan Avenue, Tampa, Florida 33606., Derek Bruce, Esq., [dbruce@gunster.com](mailto:dbruce@gunster.com), Gunster, 200 North Orange Ave., Suite 1400, Orlando, Florida 32801, Joseph Goldstein, Esq., [jgoldstein@shutts.com](mailto:jgoldstein@shutts.com), Shutts & Bowen LLP, 200 East Broward Boulevard, Suite 2100, Fort Lauderdale, Florida 33301, and to Gary Cohen, Esq., [gcohen@shutts.com](mailto:gcohen@shutts.com), Shutts & Bowen LLP, 201 S. Biscayne Blvd., 1500 Miami Center, Miami, FL 33131, this 6<sup>th</sup> day of February, 2014.



---

Wellington H. Meffert II  
Counsel for Respondent