

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
PENSACOLA DIVISION**

BAYOU LAWN & LANDSCAPE SERVICES, )  
CHAMBER OF COMMERCE OF THE UNITED )  
STATES OF AMERICA, NATIONAL HISPANIC )  
LANDSCAPE ALLIANCE, PROFESSIONAL )  
LANDCARE NETWORK, SILVICULTURAL )  
MANAGEMENT ASSOCIATES, INC., )  
FLORIDA FORESTRY ASSOCIATION, )

Plaintiffs

v.

THOMAS E. PEREZ, *et al.*,

Defendants.

No.3:12-cv-00183 MCR

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56(a), Plaintiffs move for entry of an order granting them summary judgment as to Counts I, II, III of their Complaint and vacating and permanently enjoining Defendants from enforcing or implementing the challenged regulation. A Memorandum of Points and Authorities in support of this Motion, a Local Rule 56.1 Statement of Material Facts as to Which There Is No Genuine Dispute, and a proposed Order accompany this Motion.

Respectfully submitted,

Robert P. Charrow (DC 261958)  
Laura Metcoff Klaus (DC 294272)  
Laura Reiff (DC 424579)  
GREENBERG TRAURIG LLP  
2101 L Street, N.W., Suite 1000  
Washington, D.C. 20037  
Tele: 202-533-2396; Fax: 202-261-0164  
Email: charrowr@gtlaw.com;  
klausl@gtlaw.com; reiff@gtlaw.com

s/Monte B. Lake  
Monte B. Lake (DC 925818)  
Wendel V. Hall (DC 439344)  
C.J. LAKE LLC  
525 Ninth Street, N.W., Suite 800  
Washington, D.C. 20004  
Tele: 202-465-3000; Fax: 202-347-3664  
Email: mlake@cj-lake.com;  
[whall@cj-lake.com](mailto:whall@cj-lake.com)

Counsel for Plaintiffs

Of Counsel:

Rachel L. Brand

Steven P. Lehotsky

NATIONAL CHAMBER LITIGATION CENTER, INC.

1615 H Street, N.W.

Washington, D.C. 20062

Tele: (202) 463-5337

E-mail: RBrand@USChamber.com

Counsel for Plaintiff Chamber of Commerce of the United States of America