

IN THE SUPREME COURT OF FLORIDA

CASE NO. : SC00-113

LEONARDO FRANQUI

Petitioner,

v.

ROBERT A. BUTTERWORTH, Attorney General,  
State of Florida,

and STATE OF FLORIDA,

Respondents.

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**MOTION TO JOIN EMERGENCY PETITION FOR WRIT OF  
PROHIBITION, TO INVOKE THIS COURT'S ALL WRITS  
JURISDICTION, MOTION TO DECLARE UNCONSTITUTIONAL  
THE "DEATH PENALTY REFORM ACT OF 2000," WITH  
REQUEST FOR IMMEDIATE TEMPORARY INJUNCTIVE  
RELIEF, FURTHER BRIEFING AND ORAL ARGUMENT**

Comes now the Petitioner, Leonardo Franqui, by and thru undersigned counsel and moves this Honorable Court to allow Mr Franqui to join in the **EMERGENCY PETITION FOR WRIT OF PROHIBITION, TO INVOKE THIS COURT'S ALL WRITS JURISDICTION, MOTION TO DECLARE UNCONSTITUTIONAL THE "DEATH PENALTY REFORM ACT OF 2000," WITH REQUEST FOR IMMEDIATE TEMPORARY INJUNCTIVE RELIEF , FURTHER BRIEFING, AND ORAL ARGUMENT** filed by Capital Collateral Regional Counsel- South and as grounds states:

1. Mr Franqui is a death sentenced inmate.
2. Mr Franqui is represented by collateral counsel appointed through the Registry.
3. Counsel has contacted Assistant State Attorney Penny Brill and she takes no

position on Petitioner joining the above cited motion filed by Capital Collateral Regional Counsel-South.

4. By this Court allowing Mr Franqui to join in this motion, Petitioner would not have to expend duplicate resources in filing his own motion which would mirror Capital Collateral's Regional Counsel-South's motion.

WHEREFORE Petitioner respectfully requests this Honorable Court to grant this motion and allow Petitioner Franqui to join the above cited petition and hereby adopts all pleadings filed hereto.

I HEREBY CERTIFY that a true and correct copy of the aforesaid has been mailed to the Office of the Attorney General, Department of Legal Affairs, Office of the State Attorney and Capital Collateral Regional Counsel-South this 28<sup>th</sup> day of January, 2000.

Respectfully Submitted,

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