

**STATE OF FLORIDA
PUBLIC EMPLOYEES RELATIONS COMMISSION**

HOLLYWOOD FIRE FIGHTERS,
LOCAL 1375, IAFF, INC.,

Charging Party,

v.

Case No. CA-2011-101

CITY OF HOLLYWOOD,

Respondent.

**MOTION TO REFER CASE TO HEARING OFFICER AND MOTION TO
CONSOLIDATE CASES**

On August 1, 2011, Hollywood Fire Fighters Local 1375, IAFF, Inc. (“Charging Party”) filed an unfair labor practice charge alleging that the City of Hollywood (“City”) violated sections 447.501(1)(a) and (c), Florida Statutes. On July 12, 2012, the Commission entered an order dismissing the charge. The Charging Party appealed. On January 8, 2014, the Fourth District Court of Appeal entered an order reversing the Commission’s dismissal and remanding the case for further proceedings. The mandate issued on January 24, 2014. The City appealed to the Supreme Court of Florida. On October 27, 2017, the Supreme Court entered an order declining to accept jurisdiction over this case on the basis that its recent decision in *Headley v. City of Miami*, 215 So.3d 1 (Fla. 2017), controls.

Now that the Supreme Court of Florida has declined to accept jurisdiction over the City’s appeal, all appellate recourse has been exhausted. Therefore, the Charging Party respectfully moves for the Commission to refer this case to a hearing officer for further proceedings consistent with the mandate from the Fourth District Court of Appeals and consistent with the Supreme Court decision in *Headley*.

The Charging Party also moves to consolidate this case with Case No. CA-2012-011. The facts and legal issues in both cases are very similar and consolidating these two cases would promote administrative efficiency.

Date: November 9, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was emailed this 9th day of November, 2017, to all counsel of record on the ePERC service list.

By: /s/ Dustin L. Watkins