

IN THE SUPREME COURT OF FLORIDA

DEAN K. MATT,)	
)	
Appellant,)	Case No. SC2024-0990
)	Lower Tribunal Case Number:
v.)	2024-CA-000252
)	
UNIVERSITY PARK RECREATION)	
DISTRICT,)	
)	
Appellee.		
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APPELLANT’S REQUEST FOR ORAL ARGUMENT

Appellant, DEAN K. MATT, pursuant to Florida Rule of Appellate Procedure 9.320, respectfully requests oral argument be heard in this case.

This appeal challenges the legality of the University Park Recreation District’s ("UPRD") Series 2024 Bonds, raising critical and complex issues regarding statutory compliance, constitutional due process, and judicial oversight. Specifically, this appeal presents the following: the validity of UPRD’s actions as they relate to bond validation proceedings, including the referendum process and its compliance with statutory and constitutional safeguards; the lower court’s entry of Final Judgment validating the bonds without substantial evidence demonstrating that the special benefits outweigh the debt burden, as required by *City of Boca Raton v. State*, 595

So. 2d 25 (Fla. 1992); the failure to consider all evidence and motions prior to the entry of Final Judgment; and procedural irregularities and due process violations that undermined the fairness of the proceedings.

This appeal raises issues of first impression that extend beyond a routine bond validation. The issues presented directly implicate foundational legal principles concerning bond issuance and judicial oversight, including the validity of UPRD's bond validation proceedings. As the Florida Supreme Court held in *State v. City of Miami*, bond validation proceedings must address issues "directly [related] to the power to issue the securities and the validity of the proceedings with relation thereto." Appellant's arguments challenge whether the proceedings adhered to these established standards, necessitating further judicial scrutiny.

Moreover, this has implications beyond the parties involved. Resolving these issues will clarify the legal standards governing bond issuance, referendum procedures, and the judicial review process for bond validation cases statewide. Any effort to minimize the importance of this case is without merit. Most, if not all, of the issues raised by Appellant are issues of first impression, and their resolution will ensure proper adherence to statutory and constitutional safeguards in future bond proceedings.

Appellant further asserts that oral argument is not only procedurally appropriate but also necessary to assist this Court in its consideration of the issues. Florida Rule of Appellate Procedure 9.320 requires requests for oral argument to include a brief statement explaining how oral argument will enhance the Court's understanding of the case. Here, the complexity and significance of the issues warrant oral presentation, as it will allow the parties to fully articulate their positions and respond to any questions from the Court.

Given the far-reaching implications of this case, the novel legal questions raised, and the need for a clear, informed resolution, Appellant respectfully requests that this Court grant oral argument.

Dated this 17th day of December 2024.

/s/: Dean K. Matt

By: DEAN K. MATT

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was electronically filed with the Clerk of Court using the Florida E-Portal system which will send a notice of electronic filing to Fred E. Moore, Esq. at (fmoore @ blalockwalters.com) and Cynthia Evers, Esq. at (evers @ sao12.org; saorounds @ sao12.org; jladkins @ sao12.org), this 17th day of December, 2024.

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