

Florida Supreme Court  
Office of the Clerk  
500 South Duval Street  
Tallahassee, Florida 32399

September 23, 2021

*In Re: Amendment to Florida Rule of Civil Procedure 1.280, No. SC21-929*

To the Honorable Justices of the Florida Supreme Court:

We, the undersigned, are the leading national organizations representing lawyers who primarily represent civil defendants. Over 22,000 attorneys are members of the DRI – Lawyers Representing Business and its Center for Law and Public Policy, International Association of Defense Counsel, Association of Defense Trial Attorneys, and Product Liability Advisory Council, Inc. We are also leading business, civil justice, and public policy organizations. Our members include countless Florida employers.

We support the Court’s decision to codify the “apex doctrine” and extend its protections to the private sector. As the Court recognized, prior judicial decisions in Florida clearly established the apex doctrine for high-ranking government officials. We agree with the Court that there is “no good reason to withhold from private officers the same protection that Florida courts have long afforded government officers.”

Respectfully submitted,

Associated Industries of Florida  
Florida Insurance Council  
International Association of  
Defense Counsel  
American Property Casualty  
Insurance Association  
Washington Legal Foundation  
American Trucking Associations  
National Federation of  
Independent Business  
Product Liability Advisory  
Council, Inc.

DRI – Lawyers Representing  
Business and its Center for  
Law and Public Policy  
Association of Defense  
Trial Attorneys  
National Association of Mutual  
Insurance Companies  
American Tort Reform Association  
Alliance for Automotive Innovation  
Pharmaceutical Research and  
Manufacturers of America  
Coalition for Litigation Justice, Inc.