IN THE SUPREME COURT OF THE STATE OF FL

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THOMAS B.	FERRIS,	:	
	Petitioner,	:	
		:	
Vs.		:	C
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RALPH D. TURLINGTON, as Commissioner of Education,		:	
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STATE		and the substitution of the second		
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	New Series	Deputy Clerk		
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Case	e No.	69,561		
			DEC 5 1986	DEC 5 1986 OLS COURT Deputy Clerk

## BRIEF ON JURISDICTION

ON APPEAL FROM THE DISTRICT COURT OF APPEAL FIRST DISTRICT, STATE OF FLORIDA

> JUDITH A. BRECHNER General Counsel State Board of Education Knott Building Tallahassee, Florida 32399 (904) 488-7707

Attorney for Respondent Ralph D. Turlington

While Respondent, Ralph D. Turlington, as Commissioner of Education, does not necessarily agree with Petitioner's characterization of the cases and reserves the right to discuss and distinguish the cases cited in Petitioner's brief, Respondent nevertheless concedes probable jurisdiction in the Supreme Court of Florida.

Respectfully submitted,

JUDITH A. BRECHNER General Counsel State Board of Education Knott Building Tallahassee, Florida 32399 (904) 488-7707

Attorney for Respondent Ralph D. Turlington

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by mail to JOHN J. CHAMBLEE, JR., Esquire, and SUSAN E. HICKS, Esquire, Chamblee and Miles, 202 Cardy Street, Tampa, Florida 33606, this <u>S</u> day of December, 1986.

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