

**IN THE CIRCUIT COURT OF THE, SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA**

JETBLUE AIRWAYS CORPORATION &
SUBSIDIARIES,

Plaintiff,

vs.

Case No. 2024 CA 1177

STATE OF FLORIDA,
DEPARTMENT OF REVENUE,

Defendants.

PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE

Plaintiff, JetBlue Airways Corporation & Subsidiaries ("Plaintiff" or "JetBlue")
hereby requests the Court take judicial notice of the following:

1. Article II, Section 1, of the Florida Constitution outlines Florida's
geographic state boundaries.

2. The request for judicial notice is based on section 90.202, Florida
Statutes, which provides that a Court may take judicial notice of:

(5) Official actions of the legislative, executive, and judicial
departments of the United States and of any state, territory, or
jurisdiction of the United States.

(11) Facts that are not subject to dispute because they are generally
known within the territorial jurisdiction of the court.

(12) Facts that are not subject to dispute because they are capable of
accurate and ready determination by resort to sources whose
accuracy cannot be questioned.

3. Section 90.203, Florida Statutes, provides that a court shall take judicial notice of any matter in section 90.202, Florida Statutes, when a party requests it and:

- (1) Gives each adverse party timely written notice of the request, proof of which is filed with the court, to enable the adverse party to prepare to meet the request.
- (2) Furnishes the court with sufficient information to enable it to take judicial notice of the matter.

Exhibit A attached hereto is a true and correct copy of Article II, Section 1(a), of the Florida Constitution. Section 1(a) titled "State Boundaries" provides a technical description of Florida's geographical state boundaries.

WHEREFORE, Plaintiff, JetBlue Airways Corporation & Subsidiaries, respectfully requests that this Court take judicial notice of the geographic boundaries of the State of Florida as provided by Article II, Section 1 of the Florida Constitution and attached hereto in **Exhibit A**.

Dated: September 15, 2025

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*Attorneys for JetBlue Airways
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by Florida's
E-Filing Portal on September 15, 2025, to all counsel of record.

/s/ Michael J. Bowen

Michael J. Bowen, Esq.

ARTICLE II GENERAL PROVISIONS

- SECTION 1. State boundaries.
- SECTION 2. Seat of government.
- SECTION 3. Branches of government.
- SECTION 4. State seal and flag.
- SECTION 5. Public officers.
- SECTION 6. Enemy attack.
- SECTION 7. Natural resources and scenic beauty.
- SECTION 8. Ethics in government.
- SECTION 9. English is the official language of Florida.

SECTION 1. State boundaries.—

(a) The state boundaries are: Begin at the mouth of the Perdido River, which for the purposes of this description is defined as the point where latitude 30°16'53" north and longitude 87°31'06" west intersect; thence to the point where latitude 30°17'02" north and longitude 87°31'06" west intersect; thence to the point where latitude 30°18'00" north and longitude 87°27'08" west intersect; thence to the point where the center line of the Intracoastal Canal (as the same existed on June 12, 1953) and longitude 87°27'00" west intersect; the same being in the middle of the Perdido River; thence up the middle of the Perdido River to the point where it intersects the south boundary of the State of Alabama, being also the point of intersection of the middle of the Perdido River with latitude 31°00'00" north; thence east, along the south boundary line of the State of Alabama, the same being latitude 31°00'00" north to the middle of the Chattahoochee River; thence down the middle of said river to its confluence with the Flint River; thence in a straight line to the head of the St. Marys River; thence down the middle of said river to the Atlantic Ocean; thence due east to the edge of the Gulf Stream or a distance of three geographic miles whichever is the greater distance; thence in a southerly direction along the edge of the Gulf Stream or along a line three geographic miles from the Atlantic coastline and three leagues distant from the Gulf of Mexico coastline, whichever is greater, to and through the Straits of Florida and westerly, including the Florida reefs, to a point due south of and three leagues from the southernmost point of the Marquesas Keys; thence westerly along a straight line to a point due south of and three leagues from Loggerhead Key, the westernmost of the Dry Tortugas Islands; thence westerly, northerly and easterly along the arc of a curve three leagues distant from Loggerhead Key to a point due north of Loggerhead Key; thence northeast along a straight line to a point three leagues from the coastline of Florida; thence northerly and westerly three leagues distant from the coastline to a point west of the mouth of the Perdido River three leagues from the coastline as measured on a line bearing south 0°01'00" west from the point of beginning; thence northerly along said line to the point of beginning. The State of Florida shall also include any additional territory within the United States adjacent to the Peninsula of Florida lying south of the St. Marys River, east of the Perdido River, and south of the States of Alabama and Georgia.

(b) The coastal boundaries may be extended by statute to the limits permitted by the laws of the United States or international law.