

FIRST DISTRICT COURT OF APPEAL OF FLORIDA

United Faculty of Florida v. University of Central Florida Board of Trustees and Florida Public Employees Relations Commission

No. 1D2024-1676 · No. No. 1D2024-1676 · Decided December 23, 2025

SUMMARY

The Florida First District Court of Appeal affirmed without comment the dismissal of the United Faculty of Florida’s unfair labor practice charge against the University of Central Florida Board of Trustees. The court dismissed for lack of jurisdiction the appeal concerning prevailing-party attorney’s fees and costs because the Public Employees Relations Commission had reserved jurisdiction to determine the amount of those fees.

CASE DETAILS

COURT	First District Court of Appeal of Florida
WRITING FOR THE COURT	Ray; Kelsey; Treadwell
JURISDICTION	Florida First District Court of Appeal
DECIDED	December 23, 2025
DOCKET	No. 1D2024-1676
DISPOSITION	other
PROCEDURAL POSTURE	Appeal from an order of the Florida Public Employees Relations Commission dismissing an unfair labor practice charge and awarding prevailing-party attorney's fees and costs.
PRECEDENTIAL VALUE	Published opinion
PARTIES	United Faculty of Florida v. University of Central Florida Board of Trustees, Florida Public Employees Relations Commission

TOPICS

- unfair labor practices
- labor law
- administrative law
- appellate jurisdiction
- final judgment rule

PRACTICE AREAS

- labor law
- administrative law
- appellate procedure

QUESTIONS PRESENTED

1. Whether PERC's dismissal of United Faculty of Florida's unfair labor practice charge should be affirmed.
2. Whether the portion of PERC's order awarding prevailing-party attorney's fees and costs was final and appealable when PERC reserved jurisdiction to determine the amount of the fees.

HOLDINGS

1. The court affirmed, without comment, PERC's dismissal of United Faculty of Florida's unfair labor practice charge against the University of Central Florida Board of Trustees.
2. The court dismissed for lack of jurisdiction the portion of the appeal challenging PERC's award of prevailing-party attorney's fees and costs because PERC's reservation of jurisdiction to determine the amount of fees rendered the entitlement portion of the order nonfinal and nonappealable.

KEY QUOTATIONS

“However, we dismiss for lack of jurisdiction that portion of the appeal challenging PERC’s decision to award the University prevailing party attorney’s fees and costs.” (at 1)

“See Chang v. Local 1403, Metro Dade Fire Fighters, 345 So. 3d 384, 384 (Fla. 1st DCA 2022) (explaining that PERC’s reservation of jurisdiction to determine the amount of fees renders the entitlement portion of the order nonfinal and nonappealable).” (at 1)

FACTUAL BACKGROUND

United Faculty of Florida filed an unfair labor practice charge against the University of Central Florida Board of Trustees. PERC dismissed the charge and awarded the University prevailing-party attorney's fees and costs, while reserving jurisdiction to determine the amount of those fees. The First District reviewed the resulting order on appeal.

PROCEDURAL HISTORY

United Faculty of Florida appealed a PERC order dismissing its unfair labor practice charge against the University of Central Florida Board of Trustees and awarding the University prevailing-party attorney's fees and costs. The First District affirmed the dismissal of the unfair labor practice charge without comment but dismissed for lack of jurisdiction the portion of the appeal challenging the fee and cost award.

DISPOSITION

other

CASES CITED

- Chang v. Local 1403, Metro Dade Fire Fighters, 345 So. 3d 384, 384 (Fla. 1st DCA 2022)