

No. 22-11143 (Lead)
(Consolidated Case Nos. 22-11133, 22-11144, 22-11145)

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

LEAGUE OF WOMEN VOTERS OF FLORIDA, INC., et al.

Plaintiff-Appellee,

v.

FLORIDA SECRETARY OF STATE, et al.,

Defendants-Appellants,

and

NATIONAL REPUBLICAN SENATORIAL COMMITTEE, et al.

Intervenor-Defendants-Appellants.

**STATEMENT OF PLAINTIFF-APPELLEE *HARRIET TUBMAN
FREEDOM FIGHTERS, INC.* REGARDING ADOPTION OF
LEAGUE PLAINTIFFS-APPELLEES RESPONSE BRIEF**

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**CORPORATE DISCLOSURE STATEMENT AND CERTIFICATE OF
INTERESTED PERSONS**

1. Pursuant to Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rule 26.1-1, Appellee states that it has no parent corporations, nor has it issued shares or debt securities to the public. The organization is not a subsidiary or affiliate of any publicly owned corporation, and no publicly held corporation holds ten percent of its stock.
2. I hereby certify that the disclosures of interested parties submitted by Defendant-Appellant Florida Secretary of State on July 11, 2022 and Plaintiffs-Appellees on August 10, 2022, is complete and correct except for the following additional interested person:
 - a. Matletha Bennette of the Southern Poverty Law Center is counsel for Plaintiff-Appellee Harriet Tubman Freedom Fighters.

**STATEMENT REGARDING ADOPTION OF *LEAGUE* PLAINTIFF-
APPELLEES RESPONSE BRIEF**

Pursuant to Federal Rule of Appellate Procedure 28(a)(i), *Harriet Tubman Freedom Fighters* (“HTFF”) Plaintiff-Appellee joins the Answer Brief of the *League* Plaintiffs-Appellees on all arguments related to the Registration Disclaimer provision, and adopts by reference Section III. Answer Br. at 42-49.¹

For the foregoing reasons, including those incorporated by reference, this Court should dismiss the appeal in Case 22-11133 and deny the Defendants-Appellants’ motion for partial vacatur, or, at a minimum, remand for the purposes of preserving and claiming all applicable relief.

DATED: August 10, 2022

Respectfully Submitted,

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/s/ Matletha Bennette

Matletha Bennette
Bradley Heard
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¹ In response to the State Appellants’ challenge to Plaintiffs’ standing, Gov. Br. 2., this Court should reject the Governmental Defendants’ untimely and unsubstantiated challenge to Plaintiffs’ standing. The District Court conducted a thorough assessment of the trial record and concluded that Plaintiff HTFF has standing to challenge the Registration Disclaimer Provision. Doc. 665 at 200–202. While the Parties agree that the appeal of the judgment regarding the Registration Disclaimer Provision is now moot based on repeal by SB 524, their original standing to challenge the Provision was unmistakably clear. The Provision compelled HTFF’s speech and forced HTFF to divert the resources dedicated to help voters register in underserved low-income communities. *Id.* at 200 (citing Rosemary McCoy Tr. at 255-256).

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CERTIFICATE OF COMPLIANCE

This response complies with the type-volume limitation of Rule 32(a)(7)(B) because it contains 330 words, excluding the parts that may be excluded. This response also complies with Fed. R. App. P. 32(a)(5) and (6) because it has been prepared in a proportionally spaced typeface, 14-point Times New Roman.

August 10, 2022

/s/ Matletha Bennette

Matletha Bennette

Attorney for Plaintiff-Appellee

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CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2022, a true and correct copy of the foregoing document was served upon all counsel of record by filing it in this Court's CM/ECF system.

August 10, 2022

/s/ Matletha Bennette

Matletha Bennette

Attorney for Plaintiff-Appellee

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