UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA TALLAHASSEE DIVISION

LEAGUE OF WOMEN VOTERS OF FLORIDA, INC., <i>et al.</i> ,		
Plaintiffs,		
V.		
LAUREL M. LEE, in her official		
capacity as Florida Secretary of	Case No.:	4:21-cv-186-MW/MAF
State, <i>et al.</i> ,		4:21-cv-187-MW/MAF
, ,		4:21-cv-201-MW/MAF
Defendants,		CON .
	A. C. L.	
and	1000	
	ACT	
NATIONAL REPUBLICAN	oct.	
SENATORIAL COMMITTEE and		
SENATORIAL COMMITTEE and REPUBLICAN NATIONAL		
COMMITTEE,		
Intervenor-Defendants.		

NOTICE OF FILING RESPONSE TO PLAINTIFFS' MOTION FOR LEAVE TO DEPOSE NON-PARTIES AFTER THE CLOSE OF FACT DISCOVERY

Pursuant to this Court's Order explaining that "discovery motions . . . should be filed only in the parent case," ECF No. 92 at 2, Defendant Laurel M. Lee, in her official capacity as the Florida Secretary of State, hereby files this notice informing this Court that the Secretary's response in opposition to Plaintiffs' Motion for Leave to Depose Non-Parties after the Close of Fact Discovery, Case Nos. 4:21-cv-187 (ECF No. 265) and 4:21-cv-201 (ECF No. 224), was filed in Case No. 4:21-cv-186 on the date of this

notice. This notice is filed in this case in an effort to comply with this Court's

instructions in its October 22, 2021 Order. See Case No. 4:21-cv-186 (ECF No. 291 at

2 n.1).

Dated: October 29, 2021

Respectfully submitted:

BRADLEY R. MCVAY (FBN 79034) General Counsel

Brad.McVay@dos.myflorida.com ASHLEY E. DAVIS (FBN 48302) DFROMDEMOCRACYDOCKET.COM Deputy General Counsel Ashley.Davis@dos.myflorida.com Florida Department of State R.A. Gray Building Suite 100 500 South Bronough Street Tallahassee, Florida 32399-0250 Phone: (850) 245-6536 Fax: (850) 245-6127

/s/Mohammad Jazil

Mohammad O. Jazil (FBN: 72556) Gary Perko Holtzman Vogel Baran Torchinsky & Josefiak PLLC 119 S. Monroe St. Suite 500 Tallahassee, FL 32301 mjazil@holtzmanvogel.com gperko@holtzmanvogel.com Phone No.: (850) 274-1690 Fax No.: (540) 341-8809

Phillip M. Gordon (VA Bar: 96521)* pgordon@holtzmanvogel.com 15405 John Marshall Hwy Haymarket, VA 20169 Phone No. (540)341-8808

Fax No.: (540) 341-8809 *Admitted *pro hac vice*

Attorneys for Secretary Laurel M. Lee

PETRIEVED FROM DEMOCRACY DOCKET, COM

CERTIFICATE OF SERVICE

I certify that on October 29, 2021, I caused to be served a copy of the foregoing by CM/ECF to all counsel of record. I also certify, that on October 29, 21 I served a copy of the foregoing by electronic mail to all counsel of record in the consolidated cases.

/s/ Mohammad O. Jazil

RETRIEVED FROM DEMOCRACYDOCKET.COM