

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

FLORIDA STATE CONFERENCE
OF BRANCHES AND YOUTH
UNITS OF THE NAACP, COMMON
CAUSE, and DISABILITY RIGHTS
FLORIDA, et al.,

Plaintiffs,

v.

LAUREL M. LEE,

in her official capacity as
Florida Secretary of State, et
al.,

Defendants,

REPUBLICAN NATIONAL
COMMITTEE and NATIONAL
REPUBLICAN SENATORIAL
COMMITTEE,

Intervenor-Defendants.

Case 4:21-cv-00187-MW-MAF

**SUPPLEMENTAL NOTICE OF FILING DOCUMENTS IN
SUPPORT OF PLAINTIFFS' RESPONSE AND MEMORANDUM IN
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT**

PLEASE TAKE NOTICE THAT pursuant to Federal Rule of Civil
Procedure 56 and Local Rule 56.1 and this Court's Scheduling Orders (ECF

Nos. 41 and 165), Plaintiffs Florida State Conference of Branches and Youth Units of the NAACP, Common Cause, and Disability Rights Florida hereby file the following additional exhibit in support of Plaintiffs' Response and Memorandum in Opposition to Defendants' Motion for Summary Judgment (ECF No. 306):

Exhibit No.	Description
55	Advocacy Letter from the Equal Ground Action Fund to the Rules Committee

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Dated: December 3, 2021

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*Counsel for Plaintiffs NAACP of
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served to all counsel of record through the Court's CM/ECF system on December 3, 2021.

/s/ P. Benjamin Duke

*Counsel for Plaintiffs NAACP of Florida,
Common Cause, and Disability Rights
Florida*

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Exhibit 55

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Dear Rules Committee,

We, the undersigned represent Christian Clergy Alliances across the state of Florida, write, in a spirit of unity, peace, and justice, to sincerely ask that you vote NO on SB-90 – for such a bill in its current construct will adversely affect the voter participation of those we serve.

It has come to our attention that SB-90 will not only eliminate drop boxes within our communities, but the bill also outlines additional provisions that will serve as grave impediments to the voting process, like wiping the vote by mail roles each year. We find that such a bill will cause undue confusion and exacerbate a prevalent narrative of voter suppression against certain communities.

The State Innovation Exchanges notes in a 2020 poll that 70% of Florida voters support and use drop boxes. In states that vote heavily by mail, voters are more likely to use drop boxes than the postal service. In Washington state, 73% of voters used a drop box to return their ballot last November. We're seeing similar patterns play out in Florida, and taking drop boxes away would have significant negative ripple effects across our election systems.

Many elected and community leaders across our state have expressed that Florida experienced great success during the 2020 election. What has happened since then that we are now eliminating options that proved successful and accessible?

Eliminating drop boxes will also disproportionately impact voters of color, low-income communities, individuals with disabilities, people diagnosed with the COVID-19 virus during the election period, and anyone else who is unable to travel long distances to deliver their ballot.

We lift this up because these are the communities we serve, and we want to make you aware that proceeding with this bill may cause irreparable damage to the minds and hearts of citizens who already feel their vote is suppressed.

We kindly ask that you reconsider this bill and help us restore trust and unity within and throughout our great state. Work with us to find a solution that addresses voter security, not voter suppression.

Please know we are praying for you as you lead and do what is best for all communities.

Blessings Unlimited!

Florida State Network of African American Clergy Alliances:



Apostle David Woods, Jr.
Yes Lord Deliverance Family Church, Chipley, Florida – Pastor
Tri-County Clergy Alliance – President

Rev. Dr. R.B Holmes, Jr.
Bethel Missionary Baptist Church, Tallahassee, FL – Pastor
National Action Network – President (Tallahassee)

Superintendent Karl Anderson
Upper Room Ministries, Gainesville, FL – Pastor
Gainesville Ministerial Alliance – President Emeritus/Vice President

Rev. R. L. Gundy
Mt. Sinai Missionary Baptist Church, Jacksonville, FL – Pastor
African American Ministers in Action, FL Director

Rev. Dr. Victor Gooden
New Life Church Ministries, Daytona Beach, FL – Pastor
Daytona Beach Black Clergy Alliance – President

Rev. Wendell Raulerson
Greater Bethlehem Baptist Church, Deland, FL – Pastor
Deland Clergy Alliance – President

Pastor Hezekiah Bradford
St. Luke Full Gospel Baptist Church, Apopka, FL – Pastor
Apopka Ministerial Alliance – President
South Apopka Ministerial Alliance - President

Bishop-Elect Derrick L. McRea
Experience Christian Center, Orlando, FL – Pastor
African American Council of Christian Clergy, Orlando, FL - President

Bishop Thomas Scott
34 Street Church of God, Tampa, FL – Pastor
Tampa Coalition of Clergy – Chairperson

Rev. Dr. J. R. Thicklin
Palm Beach County Clergy Alliance – President

Rev. Alphonso J. Jackson, Jr.
Greater Macedonia Missionary Baptist Church, Miami, FL - Pastor
Clergy in Action – President

Rev. Gregory Thompson
Harvest Church, Miami, FL
African American Council of Christian Clergy, Miami, FL

Pastor Marcus R. McCoy, Jr
Greater Refuge Memorial, Orlando, FL - Pastor
Equal Ground Action Fund, State Faith Director