

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

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

4:21-cv-186-MW-MAF

*Plaintiffs,*

Consolidated for trial with:

4:21-cv-187-MW-MAF

4:21-cv-201-MW-MAF

4:21-cv-242-MW-MAF

v.

LAUREL M. LEE, in her official  
Capacity as Secretary of State of  
Florida, et al.,

*Defendants,*

and

NATIONAL REPUBLICAN  
SENATORIAL COMMITTEE and  
REPUBLICAN NATIONAL  
COMMITTEE,

*Intervenor-Defendants.*

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**STATE-LEVEL DEFENDANTS' AND INTERVENOR-DEFENDANTS'  
LIST OF TRIAL CROSS EXAMINERS  
AND CROSS EXHIBITS FOR MONDAY, JANUARY 31, 2022**

Secretary of State Laurel M. Lee, Attorney General Ashley Moody (“State-level Defendants”) and Intervenor-Defendants, the Republican National Committee and National Republican Senatorial Committee, pursuant to this Court’s order during the proceedings on January 10, 2022, file their list of cross-examining

attorneys and cross exhibits for the witnesses designated by Plaintiffs for Monday, January 31, 2022:

Witness	Examiner (Plaintiff)	Exhibits (Direct)	Cross Examiner	Cross Exhibits
<b>League Plaintiffs</b>				
<i>Cecile Scoon</i>	Christina Ford	Ex. 701*	Frank Zacherl	Ex. 352 (impeachment, refreshing recollection) 9/28/21 Deposition of Cecile Scoon in her individual capacity <sup>1</sup> (impeachment, refreshing recollection) Ex. 625 Ex. 701 (if admitted over objections) Ex. 884 Ex. 1553 Ex. 1554
<ul style="list-style-type: none"> <li>• <i>Topics designated by Plaintiffs include: LWV of Florida, their membership activities, standing SB90-related burdens, SB90-related injuries, as well as Ms. Scoon's personal standing. See ECF No. 482.</i></li> </ul>				
<b>NAACP Plaintiffs</b>				
<i>Anthony DePalma</i>	Shira M. Poliak	Ex. 1110*	George Meros	Ex. 120 (impeachment, refreshing recollection) Ex. 1110 (if admitted over objections)
<ul style="list-style-type: none"> <li>• <i>Topics designated by Plaintiffs include: Disability Rights Florida, its membership and constituency, its activities, its standing, SB 90-related burdens, and SB 90-related injuries, including but not limited to SB 90-related burdens and injuries on Florida voters with disabilities. See ECF No. 482.</i></li> </ul>				

<sup>1</sup> Ms. Scoon was deposed as the corporate representative for the League of Women Voters of Florida, Inc., and in her individual capacity. The transcript of the deposition in her individual capacity was unintentionally left out of Exhibit 352.

<b>Anthony J. Brown</b>	Amia Trigg	Ex. 1064*	George Meros	Ex. 77 (impeachment, refreshing recollection) Ex. 81 Ex. 83 Ex. 84 Ex. 87 Ex. 89 Ex. 90 Ex. 1064 (if admitted over objections)
<ul style="list-style-type: none"> <li>• <i>Topics designated by Plaintiffs include: Florida State Conference of Branches and Youth Units of the NAACP, its branches, its membership, its activities, its standing, and SB 90-related burdens on Florida African-American voters and other voters of color. See ECF No. 482.</i></li> </ul>				
<b>FRT Plaintiffs</b>				
Jasmine Burney-Clark	Sabrina Khan	None	John Cycon	Ex. 101 (impeachment, refreshing recollection)
<ul style="list-style-type: none"> <li>• <i>Topics designated by Plaintiffs include: Equal Ground's activities, standing, SB 90-related burdens, and SB 90-related injuries. See ECF No. 482.</i></li> </ul>				
Esteban Garces	Janine Lopez	None	John Cycon	Ex. 165 (impeachment, refreshing recollection)
<ul style="list-style-type: none"> <li>• <i>Topics designated by Plaintiffs include: Poder Latinx's activities, standing, SB 90-related burdens, and SB 90-related injuries. See ECF No. 482.</i></li> </ul>				
<b>HTFF Plaintiffs</b>				
Rosemary McCoy	Michelle Kanter Cohen	Ex. 289 Ex. 290 Ex. 298 Ex. 1517* Ex. 1541*	Brad McVay	Ex. 286 (impeachment, refreshing recollection) Ex. 287 Ex. 288 Ex. 289 Ex. 290 Ex. 291 Ex. 292 Ex. 293

				Ex. 294 Ex. 295 Ex. 296 Ex. 297 Ex. 298 Ex. 1517 (if admitted over objections) Ex. 1541 (if admitted over objections)
<ul style="list-style-type: none"> <li>• <i>Topics designated by Plaintiffs include: Harriet Tubman Freedom Fighters Corp. activities, standing, SB 90-related burdens, SB 90-related injuries. See ECF No. 482.</i></li> </ul>				

\* *State-Level Defendants and Intervenor-Defendants have made objections to any exhibits marked with an asterisk.*

\* \* \*

The above cross exhibits are those State-Level Defendants and Intervenor-Defendants reasonably expect may be used during cross-examination of Plaintiffs' witnesses. State-Level Defendants and Intervenor-Defendants reserve the right to use additional exhibits for impeachment purposes or during cross examination if the witness's testimony differs from the topics designated by Plaintiffs or from what is reasonably expected. Although State-Level Defendants and Intervenor-Defendants preserve their objections to certain of Plaintiffs' exhibits, should any contested exhibits be admitted for direct examination, State-Level Defendants and Intervenor Defendants reserve the right to use those same exhibits during cross examination.

Dated: January 29, 2022

Respectfully submitted:

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 29, 2022, a true and correct copy of the foregoing was filed via CM/ECF, which served a copy on all parties of record.

/s/ *Mohammad O. Jazil*  
Attorney

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