

**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.

**STATE-LEVEL DEFENDANTS' AND INTERVENOR-DEFENDANTS'
AMENDED LIST OF TRIAL CROSS EXAMINERS
AND CROSS EXHIBITS FOR SATURDAY, FEBRUARY 5, 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 Saturday, February 5, 2022:

Witness	Examiner (Plaintiff)	Exhibits (Direct)	Cross Examiner	Cross Exhibits
<i>Morgan Kousser</i> (FRT)	Brenda Wright	Ex. 13* Ex. 21* Ex. 22*	George Meros	<ul style="list-style-type: none"> • Ex. 207 • Ex. 208 • Ex. 209 • Ex. 210 • ECF No. 492-1 (5/28/20 Expert Report of Morgan Kousser in <i>Jones v. DeSantis</i>, Case No. 4:19-cv-300 (N.D. Fla.)) • California Institute of Technology Archives Oral History Project – Morgan Kousser¹ • <i>Jones v. DeSantis</i>, 462 F. Supp. 3d 1196 (N.D. Fla. 2020)
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Expert analyses and opinions regarding (1) whether certain provisions of Florida’s SB 90 were adopted with the intent, or had the effect, of discriminating against racial and ethnic</i> 				

¹ Available at https://oralhistories.library.caltech.edu/304/1/Kousser_redacted%20version_final%20%282021%2C12.6%29.pdf

minorities; (2) the history of racial discrimination in voting in Florida from the late 19th century through the present; (3) the evidence supporting or undermining the state's proffered reasons for passing certain provisions of SB 90; and (4) the specific sequence of events leading up to the passage of SB 90 and other enactments and voting in Florida. See ECF No. 527.

** 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: February 4, 2022

Respectfully submitted:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 4, 2022, a true and correct copy of the foregoing was filed via CM/ECF, which served a copy on all parties of record.

/s/ Amber Stoner Nunnally
Attorney

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