

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

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

Plaintiffs,

v.

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

Defendants,

and

REPUBLICAN NATIONAL
COMMITTEE, and NATIONAL
REPUBLICAN SENATORIAL
COMMITTEE,

Intervenor-Defendants.

Cases Consolidated for Trial:

Case Nos.: 4:21-cv-186-MW/MAF
4:21-cv-187-MW/MAF
4:21-cv-201-MW/MAF
4:21-cv-242-MW/MAF

**PLAINTIFFS' NOTICE OF PARTIAL NON-OBJECTION TO
PRECLEARANCE OF B S524 CONCERNING THE REPEAL OF THE
REGISTRATION DISCLAIMER PROVISION**

Plaintiffs in the *League of Women Voters, Florida Rising Together*, and
Harriet Tubman Freedom Fighters action, through undersigned counsel,

hereby submit this Notice regarding preclearance of a portion of Section 7 of SB 524, as filed with the Court by defendants on April 25, 2022.¹ ECF 680-1.

Plaintiffs will have no objection to preclearance of the portion of Section 7 of SB 524 at lines 283-293 that amends paragraph (3), subsection (a) of section 97.0575 of the Florida Statutes. This portion of SB 524 repeals the Registration Disclaimer Provision described in section 97.0575 (3)(a), Florida Statutes (2021), as amended by Senate Bill 90, which this Court found to be in violation of the First Amendment. ECF 665.

This Notice applies solely to the portion of SB 524 referenced above, and not to any other provision of SB 524.

¹ The *NAACP* Plaintiffs did not challenge the Registration Disclaimer Provision and take no position on this notice.

Respectfully submitted this 27th day of April 2022.

/s/ John A. Freedman

Miranda Galindo *
LatinoJustice, PRLDEF
523 W Colonial Dr.
Orlando, FL 32804
Telephone: 321-418-6354
Mgalindo@latinojustice.org

Brenda Wright *
Kira Romero-Craft
Florida Bar No. 49927
DEMOS
80 Broad St, 4th Flr
New York, NY 10004
Telephone: 212-633-1405
bwright@demos.org

Judith B. Dianis *
Gilda R. Daniels
Sabrina Khan *
ADVANCEMENT PROJECT
1220 L Street, N.W., Suite 850
Washington, DC 20005
Telephone: 202-728-9557
Jbrowne@advancementproject.org
Gdaniels@advancementproject.org
Skhan@advancementproject.org

John A. Freedman*
Jeremy C. Karpatkin
Elisabeth S. Theodore*
Janine M. Lopez*
Sam I. Ferenc*
Arnold & Porter Kaye Scholer LLP

/s/ Frederick S. Wermuth

Frederick S. Wermuth
Florida Bar No. 0184111
Thomas A. Zehnder
Florida Bar No. 0063274
King, Blackwell, Zehnder
& Wermuth, P.A.
P.O. Box 1631
Orlando, FL 32802-1631
Telephone: (407) 422-2472
Facsimile: (407) 648-0161
fweruth@kbzwlaw.com
tzeahnder@kbzwlaw.com

Marc E. Elias
Elisabeth Frost*
David R. Fox*
Lalitha D. Madduri*
Christina A. Ford
Francesca Gibson*
Elias Law Group LLP
10 G St. NE, Suite 600
Washington, D.C. 20002
Telephone: (202) 968-4490
melias@elias.law
efrost@elias.law
dfox@elias.law
lmadduri@elias.law
cford@elias.law
fgibson@elias.law

*Admitted *Pro Hac Vice*

Counsel for LWV Plaintiffs

601 Massachusetts Ave., NW
Washington, D.C. 20001-3743
Telephone: 202-942-5000
John.Freedman@arnoldporter.com
Jeremy.Karpatkin@arnoldporter.com
Elisabeth.Theodore@arnoldporter.com
Janine.Lopez@arnoldporter.com
Sam.Ferenc@arnoldporter.com

Jeffrey A. Miller *
Arnold & Porter Kaye Scholer LLP
3000 El Camino Road
Five Palo Alto Square, Suite 500
Palo Alto, CA 94306-3807
Telephone: 650-319-4500
Jeffrey.Miller@arnoldporter.com

Aaron Stiefel*
Daniel R. Bernstein*
Ryan D. Buhdu*
Andrew R. Hirschel*
Arnold & Porter Kaye Scholer LLP
250 West 55th Street
New York, NY 10019-9710
Telephone: 212-836-8000
Aaron.Stiefel@arnoldporter.com
Daniel.Bernstein@arnoldporter.com
Ryan.Budhu@arnoldporter.com
Andrew.Hirshel@arnoldporter.com

*Admitted pro hac vice

Counsel for Florida Rising Plaintiffs

/s/ Michelle Kanter Cohen
Michelle Kanter Cohen*
Cecilia Aguilera*
Jon Sherman*
Fair Elections Center
1825 K Street NW, Suite 450
Washington, DC 20006
Main: (202) 331-0114
mkantercohen@fairelectionscenter.org
caguilera@fairelectionscenter.org
jsherman@fairelectionscenter.org

Nancy G. Abudu (Fla. Bar No. 111881)
Jack Michael Genberg*
Southern Poverty Law Center
P.O. Box 1287
Decatur, GA 30031-1287
Main: (404) 521-6700
Fax: (404) 221-5857
nancy.abudu@splcenter.org
jack.genberg@splcenter.org

Debra A. Dandeneau (Fla. Bar No.
0978360)
William H. Devaney*
Baker & McKenzie LLP
452 Fifth Avenue
New York, NY 10018
Tel: (212) 626-4100
debra.dandeneau@bakermckenzie.com
william.devaney@bakermckenzie.com

Attorneys for Plaintiff
*Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 27, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel in the Service List below.

/s/ Kira Romero-Craft

Kira Romero-Craft
Florida Bar No. 49927

Counsel for Plaintiffs

SERVICE LIST

Bradley R. McVay
Ashley E. Davis
Colleen E. O'Brien
William D. Chappell
Florida Department of State
RA Gray Building
500 South Bronough Street, Ste. 100
Tallahassee, FL 32399
Telephone: 850-245-6531
brad.mcvay@dos.myflorida.com
ashley.davis@dos.myflorida.com
colleen.obrien@dos.myflorida.com
david.chappell@dos.myflorida.com

Mohammad O. Jazil
Gary V. Perko
Holzman Vogel Baran Torchinsky &
Josefiak PLLC
119 S. Monroe Street, Suite 500
Tallahassee, FL 32301
Telephone: 850-567-5762
mJazil@holtzmanvogel.com

William H. Stafford, III
Bilal A. Faruqui
Karen A. Brodeen
Rachel R. Siegel
William Chorba
Office of the Attorney General
PL-01 The Capitol
Tallahassee, Florida 32399
Telephone: 850-414-3785
william.stafford@myfloridalegal.com
bilal.faruqui@myfloridalegal.com
karen.brodeen@myfloridalegal.com
rachel.siegel@myfloridalegal.com
william.chorba@myfloridalegal.com

Counsel for Defendant Ashley Moody

gperko@holtzmanvogel.com

Phillip M. Gordon
Kenneth C. Daines
Holzman Vogel Baran Torchinsky &
Josefiak PLLC
15405 John Marshall Hwy.
Haymarket, VA 20169
Telephone: 540-341-8808
pgordon@holtzmanvogel.com
kdaines@holtzmanvogel.com

Counsel for Defendant Laurel M. Lee

Robert C. Swain
Diana M. Johnson
Alachua County Attorney's Office
12 SE First St.
Gainesville, FL 32602
Telephone: 352-374-5218
bswain@alachuacounty.us
dmjohnson@alachuacounty.us

Counsel for Defendant Kim A. Barton

Frank M. Mari
John M. Janousek
Roper, P.A.
2707 E. Jefferson St.
Orlando, FL 32803

Edward P. Cuffe
Susan Erdelyi
Marks Gray, P.A.
1200 Riverplace Blvd, Ste. 800
Jacksonville, FL 32207
Telephone: 904-807-2110
sse@marksgray.com
pcuffe@marksgray.com

*Counsel for Defendants Christopher
Milton, Mark Anderson, Amanda
Seyfang, Sharon Chason, Tomi S.
Brown, Starlet Cannon, Heather Riley,
Shirley Knight, Laura Hutto, Carol
Dunaway, Travis Hart, Grant Conyers,
Janet Adkins, Charles Overturf, Tappie
Villane, Vicky Oakes, William Keen,
Jennifer Musgrove, Dana Southerland,
Deborah Osborne, Joseph Morgan,
Bobby Beasley and Carol Rudd*

Ronald A. Labasky
Brewton Plante PA
215 S. Monroe Street, Ste. 825
Tallahassee, FL 32301
Telephone: 850-222-7718

Telephone: 407-897-5150
fmari@roperpa.com
jjanousek@roperpa.com

*Counsel for Defendants Mark Negley,
Connie Sanchez, John Hanlon, Marty
Bishop, Heath Driggers, Lori Scott,
Kaiti Lenhart, and Penny Ogg*

Andy V. Bardos
James T. Moore, Jr.
GrayRobinson PA
301 S. Bronough St, Ste. 600
Tallahassee, FL 32301
Telephone: 850-577-9090
andy.bardos@gray-robinson.com
tim.moore@gray-robinson.com

*Counsel for Defendant Jennifer J.
Edwards, Leslie Swan, Alan Hays,
Tommy Doyle, Michael Bennett,
Wesley Wilcox, Joyce Griffin, Brian
Corley, Christopher Anderson and
Paul Stamoulis*

Jon A. Jouben
Kyle J. Benda
Hernando County
20 N. Main Street, Ste. 462
Brookesville, FL 34601-2850
Telephone: 351-754-4122
jjouben@co.hernando.fl.us
kbenda@co.hernando.fl.us

rlabasky@bplawfirm.net

John T. LaVia
Gardner, Bist, Bowden, Bush, Dee,
Lavia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32308
Telephone: 850-385-0070
jlavia@gbwlegal.com

*Counsel for Defendants Chris H.
Chambless, Vicki Davis, Mary Jane
Arrington, Gertrude Walker and Lori
Edwards*

Stephen M. Todd
Office of The County Attorney
601 E. Kennedy Blvd., 27th Floor
Tampa, FL 33602
Telephone: 813-272-5670
todds@hillsboroughcounty.org

Counsel for Defendant Craig Latimer

Kelly L. Vicari
Jared D. Kahn
Pinellas County Attorney's Office
315 Court Street, 6th Floor
Clearwater, FL 33756
Telephone: 727-464-3354
kvicari@pinellascounty.org
jkahn@pinellascounty.org

*Counsel for Defendant Shirley
Anderson*

Matthew R. Shaud
Escambia County Attorneys Office
221 Palafox Place, Ste. 430
Pensacola, FL 32502
Telephone: 850-595-4970
mrshaud@myescambia.com

*Counsel for Defendant David H.
Stafford*

Dale Scott
Bell & Roper, P.A.
2707 E. Jefferson St.
Orlando, Florida 32803
Telephone: 407-897-5150
dscott@bellroperlaw.com

Counsel for Defendant Maureen Baird

Robert Shearman
Geraldo F. Olivo
Henderson, Franklin, Starnes
& Holt, P.A.
1715 Monroe Street
Ft. Myers, Florida 33901
Telephone: 239-334-1346
robert.shearman@henlaw.com
jerry.olivo@henlaw.com

*Counsel for Defendants Aletris
Farnam, Diane Smith, Brenda Hoots,*

Counsel for Defendant Julie Marcus

Benjamin Salzillo
Nathaniel A. Klitsberg
Joseph K. Jarone
Brendalyn V.A. Edwards
115 South Andrews Ave., Ste. 423
Ft. Lauderdale, FL 33301
Telephone: 954-357-7600
bsalizzo@broward.org
nklitsberg@broward.org
jkjarone@broward.org
breedwards@broward.org

Counsel for Defendant Joe Scott

Craig D. Feiser
Jason Teal
Mary Margaret Giannini
117 W. Duval Street, Suite 480
Jacksonville, Florida 32202
Telephone: 904-255-5052
cfeiser@coj.net
mgiannini@coj.net

Counsel for Defendant Mike Hogan

Mark Herron
S. Denay Brown
Patrick O'Bryant
Messer Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, Florida 32308
Telephone: 850-222-0720
mherron@lawfla.com
dbrown@lawfla.com
pobryant@lawfla.com

Counsel for Defendant Mark Earley

*Therisa Meadows, Tammy Jones and
Melissa Arnold*

Gregory T. Stewart
Elizabeth D. Ellis
Kirsten H. Mood
Nabors, Giblin & Nickerson, P.A.
1500 Mahan Drive, Suite 200
Tallahassee, FL 32308
Telephone: 850-224-4070
gstewart@ngnlaw.com
eellis@ngnlaw.com
kmood@ngnlaw.com

Counsel for Defendant Paul Lux

W. Kevin Bledsoe
London L. Ott
123 W. Indiana Avenue, Room 301
Deland, Florida 32720
Telephone: 386-736-5950
kbledsoe@volusia.org
lott@volusia.org

Counsel for Defendant Lisa Lewis

Michael B. Valdes
Oren Rosenthal
Miami-Dade Attorney's Office
Stephen P. Clark Center
111 N.W. 1st Street, Suite 2810
Miami, Florida 33128
Telephone: 305-375-5620
michael.valdes@miamidade.gov
oren.rosenthal@miamidade.gov

*Counsel for Defendant Christine
White*

Nicholas Shannin
Shannin Law Firm
214 S. Lucerne Circle East
Orlando, Florida 32801
Telephone: 407-985-2222
nshannin@shanninlaw.com

Counsel for Defendant Bill Cowles

Morgan Bentley
Bentley Law Firm, P.A.
783 South Orange Ave., Third Floor
Sarasota, Florida 34236
Telephone: 941-556-9030
mbentley@thebentleylawfirm.com

Counsel for Defendant Ron Turner

Ashley D. Houlihan
Palm Beach County Supervisor of
Elections
240 S Military Trail
West Palm Beach, FL 33416
Telephone: 561-656-6200
ashleyhoulihan@votepalmbeach.gov

Ronald A. Labasky
Brewton Plante PA
215 S. Monroe Street, Ste. 825
Tallahassee, FL 32301
Telephone: 850-222-7718
rlabasky@bplawfirm.net

Counsel for Defendant Wendy Link

Benjamin J. Gibson
Daniel E. Nordby
George N. Meros, Jr.
Amber S. Nunnally
Frank A. Zacherl
Tara R. Price
Shutts & Bowen LLP
215 S. Monroe St., Ste. 804
Tallahassee, FL 32301
Telephone: 850-241-1720
bgibson@shutts.com
dnordby@shutts.com
gmeros@shutts.com
anunnally@shutts.com
fzacherl@shutts.com
tprice@shutts.com

Daniel J. Shapiro
Cameron T. Norris
Tyler R. Green
Steven C. Begakis
Consovoy McCarthy, PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
Telephone: 703-243-9423
daniel@consovoymccarthy.com
cam@consovoymccarthy.com
tyler@consovoymccarthy.com
steven@consovoymccarthy.com

*Counsel for Intervenor Defendants
Republican National Committee and
National Republican Senatorial
Committee*