

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, et al.,

Intervenor-Defendants.

Case No. 4:21-cv-186-MW/MAF
4:21-cv-187-MW/MAF
4:21-cv-201-MW/MAF
4:21-cv-242-MW/MAF
(consolidated for trial)

**STATE-LEVEL DEFENDANTS AND
DEFENDANT-INTERVENORS' AMENDED¹ WITNESS LIST**

Secretary of State Laurel M. Lee, Attorney General Ashley Moody (“State-Level Defendants”) and Defendant-Intervenors, the Republican National Committee and National Republican Senatorial Committee, hereby provide this Amended Witness List for trial.

¹ Amended due to changes made to the Plaintiffs’ initial witness list attached to the Corrected Pre-Trial Stipulation filed on December 29, 2021, (ECF No. 402-2), and the amended witness list filed by Plaintiffs on January 14, 2022, (ECF No. 438).

**A. WITNESSES STATE-LEVEL DEFENDANTS AND INTERVENOR-DEFENDANTS
WILL CALL**

FACT WITNESSES

1. Doyle, Tommy, Lee County Supervisor of Elections [LOWV- may call, NAACP-may call, HTFF-may call, Secretary & Defendant-Intervenors-will call]
2. Earley, Mark, Leon County Supervisor of Elections [LOWV, NAACP, HTFF, FRT-may call]
3. Hays, Alan, Lake County Supervisor of Elections [LOWV-may call, NAACP-may call, HTFF-may call, FRT-may call, Secretary and Defendant-Intervenors-will call] (if not by designation)
4. Matthews, Maria, Director at the Division of Elections [LOWV, NAACP, HTFF, FRTT- may call, Secretary & Defendant-Intervenors will call]
5. White, Christina, Miami-Dade County Supervisor of Elections [LOWV, NAACP, HTFF-may call, FRT-may call, Secretary-will call, Supervisor White-will call]

EXPERT WITNESSES

6. Kidd, Quentin, Ph.D.- Expert Witness [State & Defendant-Intervenors]
7. Lockerbie, Brad, Ph.D.- Expert Witness [State & Defendant-Intervenors]
8. Moreno, Dario, Ph.D.- Expert Witness [State & Defendant-Intervenors]

**B. WITNESSES STATE-LEVEL DEFENDANTS AND DEFENDANT-INTERVENORS
MAY CALL**

9. Dave Ramba, Lobbyist, Florida Association of Supervisors² [Secretary & Defendant-Intervenors]
10. Any of the witnesses on the Plaintiffs' witness list [Secretary & Defendant-Intervenors]
11. Any witness needed to impeach or rebut testimony offered on direct examination [NAACP, HTFF, FRT, Secretary & Defendant-Intervenors]

Dated: January 21, 2022

Respectfully submitted:

/s/ Mohammad O. Jazil

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² The FRT Plaintiffs designated Mr. Ramba as a “may call” witness as part of the Joint Pretrial Stipulation filed on December 29, 2021, Exhibit 2 to Corrected Joint Pretrial Stipulation (ECF No. 402-2). In that same filing, the Secretary and Defendant-Intervenors designated “Any witnesses on the Plaintiffs’ witness list.” Mr. Ramba remained on the witness list for the FRT Plaintiffs until he was removed along with other witnesses when the Plaintiffs filed their amended witness list on January 14, 2022 (ECF No. 438). Notably, Plaintiffs’ amended witness list also added a witness in Representative Blaise Ingolia who was not designated by any party on the Joint Pre-trial Stipulation consolidated witness list. The Court will benefit from and the Plaintiffs will suffer no prejudice if the Secretary or Defendant-Intervenors decide to call Mr. Ramba, a witness that was listed as part of FRT Plaintiffs’ case in chief up until two weeks before trial.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 21, 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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