

**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'  
AMENDED LIST OF TRIAL CROSS EXAMINERS  
AND CROSS EXHIBITS FOR TUESDAY, FEBRUARY 1, 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 Tuesday, February 1, 2022:

<b>Witness</b>	<b>Examiner (Plaintiff)</b>	<b>Exhibits (Direct)</b>	<b>Cross Examiner</b>	<b>Cross Exhibits</b>
<b>Jasmine Burney-Clark</b> (FRT)	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. 495.</i></li> </ul>				
<b>Anthony DePalma</b> (NAACP)	Shira M. Poliak	None	George Meros	Ex. 120 (impeachment, refreshing recollection)
<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. 495.</i></li> </ul>				
<b>Anthony J. Brown</b> (NAACP)	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. 495.</i></li> </ul>				

<b>Sylvia Albert</b> (NAACP)	Michael Fletcher	Ex. 1109* Ex. 1112* Ex. 1113* Ex. 1114*	George Meros	<ul style="list-style-type: none"> <li>• Ex. 48 (impeachment, refreshing recollection)</li> <li>• Ex. 49</li> <li>• Ex. 1109 (if admitted over objections)</li> <li>• Ex. 1112 (if admitted over objections)</li> <li>• Ex. 1113 (if admitted over objections)</li> <li>• Ex. 1114 (if admitted over objections)</li> </ul>
<ul style="list-style-type: none"> <li>• <i>Topics designated by Plaintiffs include: Common Cause, its membership, constituency, activities; standing; SB90-related burdens and injuries. See ECF No. 495.</i></li> </ul>				
<b>William S. Cooper</b> (NAACP)	Benjamin Cavataro	Ex. 10*	John Cycon	<ul style="list-style-type: none"> <li>• Ex. 10 (if admitted over objections)</li> <li>• Ex. 107 (impeachment, refreshing recollection)</li> </ul>
<ul style="list-style-type: none"> <li>• <i>Topics designated by Plaintiffs include: Florida demographics, socioeconomic data, and socioeconomic disparities; expert analyses and expert opinion related thereto. See ECF No. 495.</i></li> </ul>				
<b>Alan Madison</b> (LWV)	Francesca Gibson	None	Bilal Faruqi	<ul style="list-style-type: none"> <li>• Ex. 246 (impeachment, refreshing recollection)</li> </ul>
<ul style="list-style-type: none"> <li>• <i>Topics designated by Plaintiffs include: Mr. Madison's standing and SB90-related injuries. See ECF No. 495.</i></li> </ul>				

<i>Catherine Teti</i> (LWV)	Francesca Gibson	None	Bilal Faruqi	• None
<ul style="list-style-type: none"> <li>• <i>Topics designated by Plaintiffs include: Ms. Teti's standing and SB90-related injuries. See ECF No. 495.</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 31, 2022

Respectfully submitted:

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 31, 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