

**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 WEDNESDAY, FEBRUARY 2, 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 Wednesday, February 2, 2022:

Witness	Examiner (Plaintiff)	Exhibits (Direct)	Cross Examiner	Cross Exhibits
Frederick Velez Burgos (FRT)	Miranda Galindo	Ex. 1417* Ex. 1418* Ex. 1419*	Ben Gibson	Ex. 372 Ex. 373 Ex. 374
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Hispanic Federation's activities, standing, SB90-related burdens and injuries. See ECF No. 514.</i> 				
Alan Madison (LWV)	Francesca Gibson	None	Bilal Faruqi	Ex. 246
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Mr. Madison's standing and SB90-related injuries. See ECF No. 514.</i> 				
Sharon Austin (FRT)	Jeffrey Miller	Ex. 12* Ex. 20* Exs. 38-43* Ex. 55* Ex. 1312*	Mo Jazil	Ex. 52 <i>Jones v. DeSantis</i> , 462 F. Supp. 3d 1196 (N.D. Fla. 2020) <i>Madera v. Detzner</i> , 325 F. Supp. 3d 1269 (N.D. Fla. 2018)
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Expert analysis and opinions regarding Florida's history of discrimination against Black and Latino voters, as it pertains to whether certain provisions of SB90 were adopted with the intent, or had the effect, of discriminating against racial and ethnic minorities. See ECF No. 514.</i> 				
Jason Hahr (NAACP)	Ellen Choi	None	Tara Price	Ex. 412
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Mr. Hahr's experience of voting by mail as a voter with disabilities and impact and burden of SB90 on himself. See ECF No. 514.</i> 				
Traci Burch, Ph.D. (NAACP)	Cyrus Nasseri	Ex. 6*	Gary Perko	Ex. 61 Ex. 94 Ex. 96 <i>Jones v. DeSantis</i> , 462 F. Supp. 3d 1196 (N.D. Fla. 2020)

- *Topics designated by Plaintiffs include: Expert analyses and opinions on (1) whether certain provisions of SB90 were adopted with the intent, or had the effect, of discriminating against racial and ethnic minorities; (2) the history of racial discrimination in voting in Florida; (3) the genuineness of the stated reasons for passing certain provisions of SB90; and (4) the specific sequence of events leading up to the passage of SB90. See ECF No. 514.*

** 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 1, 2022

Respectfully submitted:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 1, 2022, a true and correct copy of the foregoing was filed via CM/ECF, which served a copy on all parties of record.

/s/ Tara R. Price
Attorney

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