

**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 THURSDAY, FEBRUARY 3, 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 Thursday, February 3, 2022:

Witness	Examiner (Plaintiff)	Exhibits (Direct)	Cross Examiner	Cross Exhibits
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)
<ul style="list-style-type: none"> • <i>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. 530.</i> 				
Susan Rogers (LWV)	Francesca Gibson	None	Karen Brodeen	None
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Ms. Roger's standing and SB90-related injures. See ECF No. 530.</i> 				
Leah Nash (LWV)	Christina Ford	Ex. 740* Ex. 741* Ex. 744* Ex. 745*	Bill Stafford	Ex. 333
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: League of Women Voter's operations, programming, and membership. See ECF No. 530.</i> 				
Joe Scott (LWV)	David Fox Janine Lopez (if necessary)	Ex. 271* Ex. 551 Ex. 1055*	Frank Zacherl	Ex. 1229 Broward County SOE's Response to NAACP's First Set of Interrogatories 10-12-21 Transcript of Deposition of Joe Scott

<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Burdens from, effect of, and lack of justification for the challenged provisions of SB90; legislative proceedings on SB90. See ECF No. 530.</i> 				
Brian Corley (LWV)	David Fox	Ex. 109* Ex. 110* Ex. 111* Ex. 112* Ex. 114* Ex. 115*	Brad McVay	Ex. 108 Ex. 1556 Ex. 1558 Ex. 1562
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Burdens from, effects of, and lack of justifications for the challenged provisions of SB90. See ECF No. 530.</i> 				

* *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 3, 2022

Respectfully submitted:

/s/ Mohammad O. Jazil
Mohammad O. Jazil (FBN: 72556)
mjazil@holtzmanvogel.com
Gary V. Perko (FBN: 855898)
gperko@holtzmanvogel.com
Holtzman Vogel Baran Torchinsky &
Josefiak PLLC
119 S. Monroe St. Suite 500
Tallahassee, FL 32301
(850) 274-1690
(540) 341-8809 (fax)

Phillip M. Gordon (VA Bar: 96521)*
pgordon@holtzmanvogel.com
15405 John Marshall Hwy
Haymarket, VA 20169
(540) 341-8808
(540) 341-8809 (fax)

BRADLEY R. MCVAY (FBN 79034)
General Counsel
Brad.McVay@dos.myflorida.com
ASHLEY E. DAVIS (FBN 48032)
Deputy General Counsel
Ashley.Davis@dos.myflorida.com
Florida Department of State
R.A. Gray Building Suite 100
500 South Bronough Street
Tallahassee, Florida 32399-0250
(850) 245-6536
(850) 245-6127 (fax)

*Admitted *pro hac vice*

Counsel for Secretary Laurel M. Lee

/s/ Amber Stoner Nunnally
Benjamin J. Gibson FBN 58661
bgibson@shutts.com
Daniel E. Nordby FBN 14588
dnordby@shutts.com
George N. Meros Jr. FBN 263321
gmeros@shutts.com
Frank A. Zacherl FBN 868094
fzacherl@shutts.com
Amber Stoner Nunnally FBN 109281
anunnally@shutts.com
Tara R. Price FBN 98073
tprice@shutts.com
SHUTTS & BOWEN LLP
215 South Monroe Street, Ste. 804
Tallahassee, Florida 32301
Tel: (850) 241-1717
Tyler Green* Utah Bar No. 10660
tyler@consovoymccarthy.com
Cameron T. Norris* Tenn. Bar No. 33467
cam@consovoymccarthy.com
Steven C. Begakis*
steven@consovoymccarthy.com
Daniel Shapiro
daniel@consovoymccarthy.com
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423

*Admitted *pro hac vice*

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 3, 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

RETRIEVED FROM DEMOCRACYDOCKET.COM