

**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'
LIST OF TRIAL CROSS EXAMINERS
AND CROSS EXHIBITS FOR MONDAY, FEBRUARY 7, 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 Monday, February 7, 2022:

Witness	Examiner (Plaintiff)	Exhibits (Direct)	Cross Examiner	Cross Exhibits
Rep. Carlos Guillermo Smith (NAACP)	Nia Joyner	None	Amber Nunnally	<ul style="list-style-type: none"> • Ex. 508 • Ex. 528 • Ex. 530 • ECF No. 481-1
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Florida Legislature and legislative process; overview and legislative history of SB90; evidence that the Legislature was made aware of concerns regarding anticipated burden and disparate impact of SB90; specific sequence of events leading up to, and departures from ordinary legislative process in passage of SB90. See ECF No. 548.</i> 				
Rep. Anna Eskamani (NAACP)	Miles Galbraith	Ex. 508 Ex. 528 Ex. 530	Amber Nunnally	<ul style="list-style-type: none"> • Ex. 508 • Ex. 528 • Ex. 530 • Ex. 536 • ECF No. 481-1
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Florida Legislature and legislative process; overview and legislative history of SB90; evidence that the Legislature was made aware of concerns regarding anticipated burden and disparate impact of SB90; specific sequence of events leading up to, and departures from ordinary legislative process in passage of SB90. See ECF No. 548.</i> 				
Cynthia Slater (NAACP)	Morenike Fajana	None	Tara Price	<ul style="list-style-type: none"> • Ex. 414
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Florida State Conference of Branches and Youth Units of NAACP, its Volusia County-Daytona Beach Branch, and their membership, constituency, activities, standing, SB90-related burdens and injuries, as well as the impact of the challenged provisions of SB90 on the witness or voters of color. See ECF No. 548.</i> 				
Cliff Albright (LWV)	Christina Ford	Ex. 703*	Bilal Faruqui	<ul style="list-style-type: none"> • Ex. 50

<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Black Voters Matter's activities, standing, and SB90-related burdens and injuries. See ECF No. 548.</i> 				
Andrea Mercado (FRT)	Janine Lopez	None	Brad McVay	<ul style="list-style-type: none"> • Ex. 303 • Ex. 304 • Ex. 305 • Ex. 306 • Ex. 307 • Ex. 308 • Ex. 309 • Ex. 310 • Ex. 311 • Ex. 312 • Ex. 1556 • Ex. 1558 • Ex. 1560 • Ex. 1562 • Ex. 1564 • Ex. 1568
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: FRT's activities, standing, SB90-related burdens and injuries. See ECF No. 548.</i> 				
Naomi Slaughter (NAACP)	Uttara Dukkipati	None	Tara Price	<ul style="list-style-type: none"> • Ex. 413
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Experience of voting as a voter with disabilities and impact of SB90 on self, including burdens imposed by SB90. See ECF No. 548.</i> 				
Amy Zukeran (NAACP)	Morgan Saunders	None	Tara Price	<ul style="list-style-type: none"> • Ex. 416
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Experience of voting as a voter with disabilities and impact of SB90 on self, including burdens imposed by SB90. See ECF No. 548.</i> 				
Gepsie Metellus (FRT)	Kira Romero	None	John Cycon	<ul style="list-style-type: none"> • Ex. 313
<ul style="list-style-type: none"> • <i>Topics designated by Plaintiffs include: Sant La Haitian Neighborhood Center's activities, standing, SB90-related burdens and injuries. See ECF No. 548.</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 5, 2022

Respectfully submitted:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 5, 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