

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION

FLORIDA RISING TOGETHER,  
et al.,

Case No. 4:21-cv-201-MW-MJF

Plaintiffs,

v.

LAUREL M. LEE, in her official  
capacity as Florida Secretary of  
State, et al.,

Defendants.

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**RESPONSE TO PLAINTIFFS' MOTION  
FOR PARTIAL SUMMARY JUDGMENT**

COME NOW,

1. Defendant Lori Scott, Supervisor of Elections for Brevard County;
2. Defendant Mark Negley, Supervisor of Elections for DeSoto County;
3. Defendant Kaiti Lenhart, Supervisor of Elections for Flagler County;
4. Defendant Connie Sanchez, Supervisor of Elections for Gilchrist County;
5. Defendant John Hanlon, Supervisor of Elections for Gulf County;
6. Defendant Karen Healy, Supervisor of Elections for Highlands County;
7. Defendant Justin "Tyler" McNeill, Supervisor of Elections for Jefferson  
County;
8. Defendant Heath Driggers, Supervisor of Elections for Madison County;

9. Defendant Chris Chambless, Supervisor of Elections for Clay County;
10. Defendant Vicki Davis, Supervisor of Elections for Martin County;
11. Defendant Mary Jane Arrington, Supervisor of Elections for Osceola County;
12. Defendant Lori Edwards, Supervisor of Elections for Polk County;
13. Defendant Gertrude Walker, Supervisor of Elections for St. Lucie County;
14. Defendant David H. Stafford, Supervisor of Elections for Escambia County;
15. Defendant Kim Barton, Supervisor of Elections for Alachua County;
16. Defendant Shirley Anderson, Supervisor of Elections for Hernando County;
17. Defendant Maureen Baird, Supervisor of Elections for Citrus County;
18. Defendant Paul A. Stamoulis, Supervisor of Elections for Charlotte County;
19. Defendant Jennifer J. Edwards, Supervisor of Elections for Collier County;
20. Defendant Leslie Rossway Swan, Supervisor of Elections for Indian River County;

21. Defendant Michael Bennett, Supervisor of Elections for Manatee County;
22. Defendant Wesley Wilcox, Supervisor of Elections for Marion County;
23. Defendant R. Joyce Griffin, Supervisor of Elections for Monroe County;
24. Defendant Brian E. Corley, Supervisor of Elections for Pasco County;
25. Defendant Chris Anderson, Supervisor of Elections for Seminole County;
26. Defendant Chris Milton, Supervisor of Elections for Baker County;
27. Defendant Mark Andersen, Supervisor of Elections for Bay County;
28. Defendant Amanda Seyfang, Supervisor of Elections for Bradford County;
29. Defendant Sharon Chason, Supervisor of Elections for Calhoun County;
30. Defendant Tomi S. Brown, Supervisor of Elections for Columbia County;
31. Defendant Starlet Cannon, Supervisor of Elections for Dixie County;
32. Defendant Heather Riley, Supervisor of Elections for Franklin County;
33. Defendant Shirley Green Knight, Supervisor of Elections for Gadsden County;
34. Defendant Laura Hutto, Supervisor of Elections for Hamilton County;

35. Defendant Carol A. Dunaway, Supervisor of Elections for Jackson County;
36. Defendant Travis Hart, Supervisor of Elections for Lafayette County;
37. Defendant Grant Conyers, Supervisor of Elections for Liberty County;
38. Defendant Janet H. Adkins, Supervisor of Elections for Nassau County;
39. Defendant Charles L. Overturf, III, Supervisor of Elections for Putnam County;
40. Defendant Vicky Oakes, Supervisor of Elections for St. Johns County;
41. Defendant Tappie A. Villane, Supervisor of Elections for Santa Rosa County;
42. Defendant William “Bill” Keen, Supervisor of Elections for Sumter County;
43. Defendant Jennifer Kinsey, Supervisor of Elections for Suwannee County;
44. Defendant Dana Southerland, Supervisor of Elections for Taylor County;
45. Defendant Deborah K. Osborne, Supervisor of Elections for Union County;
46. Defendant Joe Morgan, Supervisor of Elections for Wakulla County;
47. Defendant Bobby Beasley, Supervisor of Elections for Walton County;

48. Defendant Carol Finch Rudd, Supervisor of Elections for Washington County;

49. Defendant Lisa Lewis, Supervisor of Elections for Volusia County;

50. Defendant Julie Marcus, Supervisor of Elections for Pinellas County; and

51. Defendant Wendy Sartory Link, Supervisor of Elections for Palm Beach County,

through their respective undersigned attorneys, hereby file and serve their Response to Plaintiffs' Motion for Partial Summary Judgment ("Response").

The parties to this Response note that Plaintiffs and certain Defendants submitted extensive briefing at the motion to dismiss phase (*see, e.g.*, ECF Nos. 122, 130) and that Plaintiffs and certain Defendants, including four Supervisors of Elections, submitted extensive summary judgment briefing (*see* ECF Nos. 237, 241-1, 245-1, 252). Also, the parties to this Response reasonably anticipate that certain Defendants, including some Supervisors of Elections, will file responses affirmatively opposing Plaintiffs' Motion for Partial Summary Judgment.

The parties to this Response do not affirmatively oppose or join Plaintiffs' Motion for Partial Summary Judgment (ECF No. 241) and file this Response within the timeframe required by Local Rule 56.1(C) to aid the Court in avoiding any delay in adjudicating the motion that may have resulted if these parties had

filed no response. If the Court determines that any of the challenged provisions of SB 90 violate federal law, the parties to this Response request the opportunity to provide additional briefing regarding the timing and feasibility of specific remedies the Court might order, as well as the impact of those remedies on the administration of elections.

Respectfully submitted,

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**Local Rule 7.1(F) Certification**

Pursuant to Local Rule 7.1(F), I hereby certify that this response contains 750 words, not including the case style and signature block.

*/s/ Frank Mari*

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