

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

HARRIET TUBMAN FREEDOM
FIGHTERS, CORP. *et al.*,

Plaintiffs,

v.

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

Defendants,

REPUBLICAN NATIONAL
COMMITTEE, *et. al.*,

Intervener-Defendants.

Case No. 4:21-cv-242

Consolidated for discovery
with Case Nos. 4:21-cv-186,
4:21-cv-187, and 4:21-cv-
201

PLAINTIFF HARRIET TUBMAN FREEDOM FIGHTERS' RESPONSE
IN OPPOSITION TO DEFENDANT CRAIG LATIMER'S
MOTION FOR SUMMARY JUDGMENT

As he is no longer a Defendant in this action, Craig Latimer's Motion for Summary Judgment, ECF 211, is moot and should be dismissed. This Court previously dismissed Count IV of Plaintiff's Amended Complaint, the only Count asserted against Craig Latimer (in his official capacity as the Supervisor of Elections for Hillsborough County), in its October 8, 2021 Order on Motions to Dismiss. ECF 190 at 19-22; *id.* at 26; *see also* ECF 44 at 46, 50, 58. 60 (naming Supervisors only

as Defendants to Count IV and not as to Counts I-III). On November 12, 2021, Mr. Latimer filed a Motion for Summary Judgment or Alternatively for Judgment on the Pleadings arguing that “dismissal was appropriate as to [Mr. Latimer].” ECF 211 at 3. Because Count IV was dismissed in its entirety for lack of standing, Mr. Latimer has already been dismissed as a defendant, and is no longer a party to this action.

WHEREFORE, Plaintiff respectfully requests this Court deny as moot Craig Latimer’s Motion for Summary Judgment or Alternatively for Judgment on the Pleadings.

Dated: December 3, 2021

Respectfully submitted,
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CERTIFICATE OF WORD COUNT

The undersigned certifies on this 3rd day of December, 2021, that this document complies with word limits set forth in Rule 7.1(F), N.D. Fla. Loc. R., and contains 193 words which includes the headings, footnotes, and quotations, but does not include the case style, signature block or Certificates of Word Count and Service.

/s/ Michelle E. Kanter Cohen

Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned certifies that on this 3rd day of December, 2021, a true and correct copy of the foregoing was electronically filed in the US District Court, Northern District of Florida, using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Michelle E. Kanter Cohen

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