

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
GAINESVILLE DIVISION

VOTE.ORG; FLORIDA ALLIANCE  
FOR RETIRED AMERICANS;  
FLORIDA STATE CONFERENCE OF  
BRANCHES AND YOUTH UNITS OF  
THE NAACP,

*Plaintiffs,*

v.

CORD BYRD, in his official capacity as  
Secretary of State of Florida, et al.,

*Defendants,*

REPUBLICAN NATIONAL  
COMMITTEE and REPUBLICAN  
PARTY OF PASCO COUNTY,

*Proposed Intervenor-Defendants.*

No. 4:23-cv-00111-AW-MAF

[PROPOSED] INTERVENOR-DEFENDANTS' [PROPOSED] ANSWER

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Intervenors—the Republican National Committee and the Republican Party of Pasco County—now answer Plaintiffs’ complaint (Doc. 1). Unless expressly admitted below, every allegation in the complaint is denied. When Intervenors say something “speaks for itself,” they do not admit that the referenced material exists, is accurate, or is placed in the proper context. Accordingly, Intervenors state:

1. The cited statute speaks for itself. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

2. Intervenors deny that the original-signature requirement serves “no purpose other than to impede some Floridians’ right to vote.” This paragraph otherwise contains legal arguments and conclusions to which no response is required.

3. The cited cases and statute speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

4. Intervenors deny that the original-signature requirement “bears no relation to [voting] qualifications and does not serve any purpose for which a digital, electronic, or facsimile signature would not suffice.” Intervenors also deny that the original-signature requirement “serves no purpose other than to deny some Floridians their constitutional right to vote.” This paragraph otherwise contains legal arguments and conclusions to which no response is required.

5. This paragraph contains legal arguments and conclusions to which no response is required.

## JURISDICTION AND VENUE

6. Intervenor deny that Plaintiffs have a cause of action under under 52 U.S.C. § 10101(a)(2)(B). The cited statutes otherwise speak for themselves, and the remainder of this paragraph contains legal arguments and conclusions to which no response is required.

7. The cited statutes speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

8. This paragraph contains legal arguments and conclusions to which no response is required.

9. The cited statutes speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

10. The cited legal authorities speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

11. Intervenor lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

12. Intervenor lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

13. Intervenor lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

14. Intervenor lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

15. Intervenors lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

16. Intervenors lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

17. Intervenors lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

18. Intervenors lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

19. Intervenors lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

20. Intervenors deny that the original-signature requirement is burdensome. Intervenors otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

21. The first sentence of this paragraph is a legal argument to which no response is required. Intervenors otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

22. Defendants admit that Cord Byrd is the Florida Secretary of State. The cited statutes speak for themselves, and this paragraph otherwise contains legal arguments and conclusions to which no response is required.

23. The first two sentences of this paragraph contain legal arguments and conclusions to which no response is required. The cited statute speaks for itself, and Intervenor otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore deny the allegations.

24. Deny.

25. The cited statutes speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

26. The cited legal authorities speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

27. The cited legal authorities speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

28. The cited statute speaks for itself. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

29. The cited statute speaks for itself. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

30. The cited statute speaks for itself. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

31. The cited legal authorities speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

32. The cited statute speaks for itself. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

33. The cited legal authorities speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

34. The cited legal authorities speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

35. The cited statutes speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

### **CLAIM FOR RELIEF**

#### **COUNT I**

**52 U.S.C. § 10101; 42 U.S.C. § 1983**

**Violation of 52 U.S.C. § 10101(a)(2)(B)**

36. Intervenors incorporate by reference the previously alleged paragraphs.

37. The cited statute speaks for itself.

38. The cited statute speaks for itself.

39. The cited case speaks for itself.

40. The cited case speaks for itself. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

41. The cited legal authorities speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

42. The cited statutes speak for themselves. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

43. The cited case speaks for itself. This paragraph otherwise contains legal arguments and conclusions to which no response is required.

## **RESPONSE TO PRAYER FOR RELIEF**

Intervenors deny that Plaintiffs are entitled to their requested relief.

### **AFFIRMATIVE DEFENSES**

1. The allegations in the complaint fail to state a claim.
2. Plaintiffs' requested relief is barred by the *Purcell* principle.
3. Plaintiffs lack a cause of action.
4. Plaintiffs lack standing to assert their claims.

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Dated: April 5, 2023

Respectfully submitted,

/s/ Daniel E. Nordby

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**CERTIFICATE OF SERVICE**

I e-filed this document, which will serve all parties whose counsel have entered appearances. Those parties who have not yet appeared will be served via email.

*/s/ Daniel E. Nordby*

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