UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA TALLAHASSEE DIVISION

FLORIDA STATE CONFERENCE OF BRANCHES AND YOUTH UNITS OF THE NAACP; VOTERS OF TOMORROW ACTION, INC.; DISABILITY RIGHTS FLORIDA; ALIANZA FOR PROGRESS; ALIANZA CENTER; UNIDOSUS; FLORIDA ALLIANCE FOR RETIRED AMERICANS; SANTIAGO MAYER ARTASANCHEZ; and ESPERANZA SÁNCHEZ,

Case No. 4:23-cv-00215-MW-MAF

Plaintiffs,

v.

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

Defendants.

EJRST JOINT STATUS REPORT

Pursuant to this Court's Initial Scheduling Order dated June 1, 2023 (ECF No. 23), Plaintiffs Florida State Conference of Branches and Youth Units of the NAACP, Voters of Tomorrow Action, Inc., Disability Rights Florida, Alianza for Progress, Alianza Center, UnidosUS, Florida Alliance for Retired Americans, Santiago Mayer Artasanchez, and Esperanza Sanchez; Defendant Cord Byrd, in his official capacity as the Florida Secretary of State ("Secretary"); Defendant Ashley Moody, in her official capacity as the Florida Attorney General ("Attorney General"); and all 67

Florida counties' Supervisors of Elections, in their official capacities as supervisors of elections (herein collectively referred to as the "Parties"), respectfully submit their Joint Status Report and state:

- 1. On June 9, 2023, Plaintiffs filed their pending Motion for Preliminary Injunction (ECF No. 55), to which the Secretary filed his Response in Opposition (ECF No. 92) and the Attorney General filed a Notice of Joinder (ECF No. 91) on June 23, 2023. Plaintiffs filed a Reply in Support of Motion for Preliminary Injunction (ECF No. 94) on June 26, 2023.
- 2. On June 9, 2023, Plaintiffs filed their First Amended Complaint (ECF No. 52).
- 3. On June 28, 2023, this Court heard argument on Plaintiffs' motion for preliminary injunction. The parties anticipate that this Court's forthcoming ruling may impact the course of discovery.
- 4. Plaintiffs intend to issue their First Set of Requests for Production to the Secretary, Attorney General, and Supervisors of Elections Defendants within the next several weeks.
- 5. Plaintiffs intend to issue their First Set of Requests For Admission to the Secretary, Attorney General, and Supervisors of Elections Defendants within the next several weeks.

6. The Secretary and Attorney General intend to serve discovery requests on the Plaintiffs at the appropriate time.

Respectfully submitted this 30th day of June, 2023.

/s/ Frederick S. Wermuth

Frederick S. Wermuth Florida Bar No. 0184111

KING, BLACKWELL, ZEHNDER & WERMUTH, P.A.

P.O. Box 1631

Orlando, FL 32802-1631 Telephone: (407) 422-2472 fwermuth@kbzwlaw.com

Abha Khanna*

Makeba Rutahindurwa*

ELIAS LAW GROUP LLP

1700 Seventh Ave., Suite 2100 Seattle, Washington 98101 Telephone: (206) 656-0177 akhanna@elias.law mrutahindurwa@elias.law

Lalitha D. Madduri* Melinda Johnson* Renata O'Donnell*

ELIAS LAW GROUP LLP

250 Massachusetts Ave NW, Suite 400 Washington, D.C. 20001 Telephone: (202) 968-4490

lmadduri@elias.law

/s/ Mohammad Jazil

Mohammad Jazil

Florida Bar No. 72556

Michael Beato

Florida Bar No. 1017715

Joshua Pratt

Florida Bar Ne. 119347

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK

119 S. Monroe Street, Ste. 500

Tallahassee, FL 32301

Telephone: (850) 274-1690 mjazil@holtzmanvogel.com mbeato@hotlmanvogel.com Jpratt@holtzmanvogel.com

Joseph Van de Bogart Florida Bar No. 84764 Ashely E. Davis

Florida Bar No. 48302

FLORIDA DEPARTMENT OF STATE

500 S. Bronough Street Tallahassee, Florida 32399 Phone: (850) 245-6519

Joseph.Vandebogart@dos.myflorida.com

Ashley.Davis@dos.myflorida.com

Counsel for Secretary Cord Byrd /s/Stephanie A. Morse

Stephanie A. Morse

Fla. Bar No. 0068713

mjohnson@elias.law rodonnell@elias.law *Admitted Pro Hac Vice

Counsel for Plaintiffs Florida State Conference of Branches of Youth Units of the NAACP, Voters of Tomorrow Action, Inc., Disability Rights Florida, Alianza for Progress, Alianza Center, UnidosUS, Florida Alliance for Retired Americans, Santiago Mayer Artasanchez, and Esperanza Sánchez Noah Sjostrom
Fla. Bar No. 1039142

Office of the Attorney General
Complex Litigation Bureau
PL 01 The Capitol
Tallahassee, FL 32399-1050
Telephone: (850) 414-3300
Stephanie.Morse@myfloridalegal.com
Noah.Sjostrom@myfloridalegal.com
Counsel for Ashley Moody

/s/ Frank Mari

Frank M. Mari Florida Bar No. 93243

ROPER, P.A.

2707 E. Jefferson St. Orlando, Florida 32803

Telephone: (407) 897-5150

Facsimile: (407) 897-3332

fmari@roperpa.com

Counsel for Mark Negley, DeSoto
County Supervisor of Elections; Connie
Sanchez, Gilchrist County Supervisor of
Elections; Kaiti Lenhart, Flagler
County Supervisor of Elections; Karen
Healy, Highlands County Supervisor of
Elections; Tim Bobanic, Brevard
County Supervisor of Elections; Heath
Driggers, Madison County Supervisor
of Elections; Michelle Milligan,
Jefferson County Supervisor of
Elections

/s/ Andy Bardos

Andy Bardos Florida Bar No. 822671 GRAYROBINSON, P.A.

301 S. Bronough Street, Suite 600 Tallahassee, Florida 32301 Telephone: (850)577-9090 andy.bardos@gray-robinson.com

Counsel for Leah Valenti, Charlotte
County Supervisor of Elections;
Melissa Blazier, Collier County
Supervisor of Elections; Leslie Swan,
Indian River County Supervisor of
Elections; Alan Hays, Lake County
Supervisor of Elections; Tommy Doyle,
Lee County Supervisor of Elections;
Michael Bennett, Manatee County
Supervisor of Elections; Wesley
Wilcox, Marion County Supervisor of
Elections; Joyce Griffin, Monroe
County Supervisor of Elections; Brian
Corley, Pasco County Supervisor of

Elections; Chris Anderson, Seminole County Supervisor of Elections

/s/ Susan Erdelyi

Susan S. Erdelyi

Florida Bar No. 0648965

MARKS GRAY, P.A.

1200 Riverplace Blvd., Suite 800

Jacksonville, Florida 32207

Telephone: (904) 398-0900

Facsimile: (904) 399-8440

serdelyi@marksgray.com

jfavale@marksgray.com

Counsel for Christopher Milton, Baker County Supervisor of Elections; Mark Andersen, Bay County Supervisor of Elections; Amanda Seyfang, Bradford County Supervisor of Elections; Sharon Chason, Calhoun County Supervisor of Elections; Tomi Stinson Brown, Columbia County Supervisor of Elections; Starlet Cannon, Dixie County Supervisor of Elections; Heather Riley, Franklin County Supervisor of Elections; Shirley Knight, Gadsden County Supervisor of Elections; John Hanlon, Gulf County Supervisor of Elections; Laura Hutto, Hamilton County Supervisor of Elections; Carol A. Dunaway, Jackson County Supervisor of Elections; Travis Hart, Lafayette County Supervisor of Elections; Grant Conyers, Liberty County Supervisor of Elections; Janet H. Adkins, Nassau County Supervisor of Elections; Charles Overturf, Putnam

/s/ Geraldo Olivo

Geraldo F. Olivo, III

Florida Bar No. 0060905

William Boltrek

Florida Bar No. 100901

HENDERSON, FRANKLIN, STARNES

& HOLT, P.A.

P.O. Box 280

Fort Myers, Florida 33902

Telephone: (239) 344-1168

jerry.olivo@henlaw.com

Counsel for Diane Smith, Hardee County Supervisor of Elections;

Brenda Hoots, Hendry County Supervisor of Elections;

Melissa Arnold, Okeechobee County Supervisor of Elections;

Tammy Jones, Levy County Supervisor of Elections; Therisa Meadows, Holmes County Supervisor of Elections;

Aletris Farnam, Glades County Supervisor of Elections

County Supervisor of Elections; Tappie A. Villane, Santa Rosa County Supervisor of Elections; Vicky Oakes, St. Johns County Supervisor of Elections; William Keen, Sumter County Supervisor of Elections; Jennifer Kinsey, Suwannee County Supervisor of Elections; Dana Southerland, Taylor County Supervisor of Elections; Deborah K. Osborne, Union County Supervisor of Elections; Joseph Morgan, Wakulla County Supervisor of Elections; Ryan Messer, JEVED FROM DEMOCRACYDOCKET, COM Walton County Supervisor of Elections; Carol F. Rudd, Washington County Supervisor of Elections

/s/ John LaVia

Ronald A. Labasky

Florida Bar No. 206326

BREWTON PLANTE, P.A.

P.O. Box 350

Tallahassee, Florida 32302

Telephone: (850) 566-2396

rlabasky@icloud.com

John T. LaVia, III

Florida Bar No. 0853666

GARDNER, BIST, BOWDEN, DEE, LAVIA, WRIGHT, PERRY &

HARPER, P.A.

1300 Thomaswood Drive

Tallahassee, Florida 32308

Telephone: (850) 385-0070

Facsimile: (850) 385-5416

ilavia@gbwlegal.com

Counsel for Chris Chambless, Clay County Supervisor of Elections; Vicki Davis, Martin County Supervisor of Elections; Mary Jane Arrington, Osceola County Supervisor of Elections; Lori Edwards, Polk County Supervisor of Elections; Gertrude Walker, St. Lucie County Supervisor of Elections

/s/ Bob Swain

Robert C. Swain

Florida Bar No. 366961

Diana M. Johnson

Florida Bar No. 69160

ALACHUA COUNTY ATTORNEY'S OFFICE

12 Southeast 1st Street Gainesville, Florida 32601

Telephone: (352) 374-5218

Facsimile: (352) 374-5216

bswain@alachuacounty.us dmjohnson@alachuacounty.us

Counsel for Kim A. Barton, Alachua County Supervisor of Elections

/s/ Nathaniel Klitsberg

Nathaniel A. Klitsberg

Florida Bar No. 307520

Joseph K. Jarone

Florida Bar No. 117768

Devona A. Reynolds Perez

Florida Bar No. 70409

BROWARD COUNTY ATTORNEY

115 South Andrews Avenue, Suite 423

Fort Lauderdale, Florida 33301

Telephone: (954)357-7600

nklitsberg@broward.org

jkjarone@broward.org

dreynold sperez@broward.org

Counsel for Joe Scott, Broward County Supervisor of Elections

/s/ Dale Scott

Dale A. Scott

Florida Bar No. 0568821

ROPER, P.A.

2707 E. Jefferson Street

/s/ Craig Feiser

Craig D. Feiser

Florida Bar No. 164593

OFFICE OF THE GENERAL COUNSEL

117 W. Duval Street, Suite 480

Orlando, Florida 32803

Telephone: (407)897-5150

Facsimile: (407)897-3332

dscott@roperpa.com

Counsel for Maureen "Mo" Baird, Citrus County Supervisor of Elections Jacksonville, Florida 32202 Telephone: (904) 255-5100

Facsimile: (904) 255-5120

CFeiser@coj.net

Counsel for Mike Hogan, Duval County Supervisor of Elections

s/ Christi Hankins

Christi Hankins

Florida Bar No. 483321

ESCAMBIA COUNTY ATTORNEY'S OFFICE

221 Palafox Place, Suite 430

Pensacola, Florida 32502

Telephone: (850) 595-4970

cjhankins@myescambia.com

Counsel for David H. Stafford, Escambia County Supervisor of Elections

/s/ *Kyle Benda*

Jon A. Jouben

Florida Bar No. 149561

Kyle Benda

Florida Bar No. 113525

HERNANDO COUNTY ATTORNEY'S

OFFICE

20 N. Main Street, Suite 462

Brooksville, Florida 34601

Telephone: (352) 754-4122

Facsimile: (352) 754-4001

Jjouben@co.hernando.fl.us

kbenda@co.hernando.fl.us

Counsel for Shirley Anderson, Hernando County Supervisor of

Elections

/s/ Stephen M. Todd

Stephen M. Todd

Florida Bar No. 0886203

OFFICE OF THE COUNTY ATTORNEY

Post Office Box 1110

Tampa, Florida 33601-1110

Telephone: (813) 272-5670

Facsimile: (813) 272-5758

/s/ Mark Herron

Mark Herron

Florida Bar No. 199737

MESSER CAPARELLO, P.A.

Post Office Box 15579

Tallahassee, Florida 32317

Telephone: (850) 222-0720

Facsimile: (850) 558-0659

ToddS@hillsboroughcounty.org

mherron@lawfla.com

Counsel for Craig Latimer, Hillsborough County Supervisor of Elections Counsel for Mark Earley, Leon County Supervisor of Elections

/s/ *Michael Valdes*

Michael B. Valdes

Florida Bar No. 93129

MIAMI-DADE COUNTY ATTORNEY'S OFFICE

111 N.W. 1st Street, Suite 2810

Miami, Florida 33128

Telephone: (305) 375-5151

Facsimile: (305) 375-5634

mbv@miamidade.gov

Counsel for Christina White, Supervisor of Elections for Miami-Dade County

/s/ *Matthew Shaud*

Gregory T. Stewart

Florida Bar No. 203718

Matthew R. Shaud

Florida Bar No. 122252

NABORS, GIBLIN & NICKERSON, P.A.

1500 Mahan Drive, Suite 200

Tallahassee, Florida 32308

Telephone: (850) 224-4070

Facsimile: (850) 224-4073

gstewart@ngnlaw.com

mshaud@ngnlaw.com

Counsel for Paul Lux, Okaloosa County Supervisor of Elections

/s/ Nicholas Shannin

Nicholas Shannin

Florida Bar No. 9570

SHANNIN LAW FIRM

214 S. Lucerne Circle East

Orlando, Florida 32801

Telephone: (407) 985-2222

nshannin@shanninlaw.com

Counsel for Bill Cowles, Orange County Supervisor of Elections

/s/ David Markarian

Jessica Glickman

Florida Bar No. 118586

David Markarian

Florida Bar No. 480691

THE MARKARIAN GROUP

2925 PGA Blvd., Ste. 204

Palm Beach Gardens, FL 33410

jessica@forbusinessandlife.com

dave@forbusinessandlife.com

Counsel For Wendy Sartory Link, Palm Beach County Supervisor of Elections

/s/ Jared Lahn

Jared Kahn

Florida Bar No. 105276

PINELLAS COUNTY ATTORNEY'S OFFICE

315 Court Street, Sixth Floor Clearwater, Florida 33756

Telephone: (727) 464-3354

Facsimile: (727) 464-4147

kvicari@pinellas.gov

RIEVEDFRONDENOCRACYDOC Counsel for Julie Marcus, Pinellas County Supervisor of Elections

/s/ Kevin Bledsoe

W. Kevin Bledsoe

Florida Bar No. 029769

Sarah Jonas

Florida Bar No. 115989

123 W. Indiana Avenue

Deland, Florida 32720

Telephone: 386-736-5950

kbledsoe@volusia.org

sjonas@volusia.org

Counsel for Lisa Lewis, Volusia County Supervisor of Elections

/s/ Morgan Bentley

Morgan Bentley

Florida Bar No. 0962287

BENTLEY GOODRICH KISON, P.A.

783 S. Orange Ave., Third Floor

Sarasota, Florida 34236

Telephone: 941-556-9030

mbentley@bgk.law

Counsel for Ron Turner, Sarasota County Supervisor of Elections

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2023 I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Fritz S. Wermuth
Frederick S. Wermuth
Florida Bar No.: 0184111
Counsel for Plaintiffs

RETRIEVED FROM DEMOCRACY DOCKET. COM