

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

FLORIDA DECIDES  
HEALTHCARE, INC., *et al.*,

*Plaintiffs*

v.

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

*Defendants*

Case No. 4:25-cv-00211-MW-MAF

**INTEVENOR-PLAINTIFFS PODER LATINX, HUMBERTO ORJUELA  
PRIETO, AND YIVIAN LOPEZ GARCIA'S NOTICE OF JOINDER OF  
LEAGUE OF WOMEN VOTERS FLORIDA ET AL. AND  
FLORIDARIGHTTOCLEANWATER.ORG ET AL.'s MOTIONS FOR  
PRELIMINARY INJUNCTION (Dkt. 173-1 & 175-1) AND  
SUPPLEMENTAL POINTS AND AUTHORITIES**

Intervenor-Plaintiffs Poder Latinx, Humberto Orjuela Prieto, and Yivian Lopez Garcia (hereinafter, “Poder Plaintiffs”) respectfully submit this Notice pursuant to Federal Rule of Civil Procedure 28(i) to join the Motions for Preliminary Injunction Filed by FloridaRightToCleanWater.org *et al.* (Dkt. 173-1) and League of Women Voters Florida *et al.* (Dkt. 175-1). Poder Plaintiffs incorporate by reference the arguments in those briefs concerning likelihood of success on the merits and other equitable factors on enjoining enforcement of H.B. 1205’s non-citizen provision, Fla. Stat. § 100.371(4)(b)(2) (hereinafter, “Non-Citizen Ban” or “the Law”), which prohibits non-U.S. citizens from assisting with petition circulation – specifically Dkt. 173-1 at 14-23 & 40-41 and Dkt. 175-1 at 5-13 & 26-27. In addition to these points, the Poder Plaintiffs provide this supplemental brief focused on their standing and the irreparable harm they would suffer if the Non-Citizen Ban comes into effect.

## **I. FACTUAL BACKGROUND**

### **a. The Challenged Law**

On May 2, 2025, Florida enacted H.B. 1205, which contains provisions that make it more difficult for Floridians to amend their constitution through ballot initiatives. Among these provisions is an outright ban prohibiting non-U.S. citizens from working as petition circulators. H.B. 1205 imposes a \$50,000 fine on the

sponsor of an initiative amendment “for each person the sponsor knowingly allows to collect petition forms on behalf of the sponsor in violation of” the Non-Citizen Ban. Fla. Stat. § 100.371(4)(g). It also contains a citizen oath, requiring petition circulators to affirm under penalty of perjury that all people physically possessing, delivering, or collecting over 25 signed petitions on their behalf are citizens. Fla. Stat. § 100.371(4)(c)(7).

**b. Poder Plaintiffs’ Involvement with Initiative Petitions**

Poder Latinx (“Poder”) is a national social justice, organizing, and civic engagement community-based organization. Poder Decl. ¶ 5. Its mission is to help ensure that Latino communities, inclusive of immigrants and people of color, are decision-makers in our democracy. Poder Decl. ¶ 5. Poder conducts year-round civic engagement activities and issue-based organizing in Florida. Poder Decl. ¶ 6. Through its petitioning efforts, Poder educates voters on issues that impact their lives and supports causes that will advance its mission. Poder Decl. ¶¶ 7-8.

The Law prohibits Poder from continuing to have its non-citizen employees gather signatures to put Medicaid expansion on the ballot and from carrying out its plan to hire veteran non-citizen canvassers to scale up its team to support petition gathering for the Medicaid expansion initiative. Poder Decl. ¶¶ 10, 11, 13, 14. Poder’s staff started working on this campaign in April 2025, when Poder launched

a petitioning program during a series of public events in Orange County. Poder Decl. ¶ 13. At these events, Poder staff incorporated tabling for the citizen-led amendment to expand Medicaid access in Florida. Poder Decl. ¶ 13. Poder had also planned to significantly expand its petitioning efforts by engaging more of its workforce, hiring paid canvassers and deploying its volunteers. Poder Decl. ¶¶ 14, 16, 17, 22. The Law's ban on non-citizen petition circulators forced Poder to stop these petition circulation activities. Poder Decl. ¶ 18, 20.

Humberto Orjuela Prieto is a lawful permanent resident living in Florida. Orjuela Prieto Decl. ¶¶ 2, 3, 4, 6. He has been canvassing for various campaigns and community-based organizations, including Poder, Unidos US, and Mi Familia Vota, since 2022. Orjuela Prieto Decl. ¶¶ 8, 9. He planned to be employed as a petition circulator for Poder to put Medicaid expansion on the ballot in Florida in 2025 but is now categorically banned from assisting with any initiative petitioning work on the basis of his alienage under the Non-Citizen Ban. Orjuela Prieto Decl. ¶¶ 11, 15.

Yivian Lopez Garcia is also a lawful permanent resident living in Florida. Lopez Garcia Decl. ¶¶ 3, 5. She has canvassed for various campaigns and community-based organizations, including Poder, Unidos US, and Mi Familia Vota, since 2018. Lopez Garcia Decl. ¶ 7. Ms. Lopez Garcia collected petitions to help pass Amendment 4, which restored the right to vote for formerly incarcerated

individuals in the state of Florida. Lopez Garcia Decl. ¶ 8. She planned to work as a paid petition circulator for Poder to put Medicaid expansion on the 2025 ballot in Florida. Lopez Garcia Decl. ¶ 9. But the Non-Citizen Ban categorically bans her from assisting with any initiative petitioning work in Florida on the basis of her alienage. Lopez Garcia Decl. ¶ 11, 12.

**c. The Law's Severe Impact on Poder Plaintiffs**

The Non-Citizen Ban severely harms Poder in at least five ways. First, the Non-Citizen Ban will decimate Poder's initiative petition circulator workforce and volunteer base. Poder Decl. ¶¶ 10, 11, 15, 24. The majority of Poder's workforce (both staff and paid canvassers) and volunteer base are non-citizens who are now barred from engaging in petition circulation in Florida. Poder Decl. ¶ 10. The Non-Citizen Ban has already halted all of Poder's petition circulating activities and plans to expand its petition circulator program. Poder Decl. ¶¶ 20, 21, 22. Even if Poder resumes petitioning activities, the abrupt loss of its hiring pool of non-citizen canvassers and staff will severely impede Poder's ability to run an effective petition circulator program in support of Medicaid expansion. Poder Decl. ¶¶ 21-26. This harms Poder's mission to increase Latino participation in direct democracy, expand economic mobility for the Latino community, and promote civic engagement of Latino immigrants. Poder Decl. ¶¶ 19, 27.

Second, Poder's attempts to comply with the Law will tie up significant organizational resources. Poder Decl. ¶¶ 21, 22, 30, 33, 36. This will hamper Poder's functioning and limit the effectiveness of its petitioning program. Poder Decl. ¶¶ 23, 24, 32, 36. The Non-Citizen Ban will result in Poder losing non-citizen staff's experience and institutional knowledge. Poder Decl. ¶¶ 16, 24, 25, 26. Many of Poder's most experienced canvassers will be instantly affected: people who have risen to senior and leadership positions, those who have developed deep relationships with the communities Poder serves, and those who train new canvassers. Poder Decl. ¶¶ 10, 11, 16, 17, 24, 25, 26. Losing these relationships will have tangible impacts on Poder's speech and association. Poder Decl. ¶¶ 24, 25, 26, 29, 31, 32, 35, 36, 37, 38. Non-citizen employees' relationships with local businesses allow canvassers to collect signatures on the businesses' properties. Poder Decl. ¶ 25. The loss of those relationships will silence Poder, because the staff that local businesses know and trust can no longer engage in signature collection. Poder will also have to redirect funding that would have gone to community programming towards hiring, vetting, and training new staff and volunteers, as well as rebuilding institutional knowledge and relationships. Poder Decl. ¶¶ 30, 31, 33, 36.

Third, Poder will be forced to take significant additional measures to ensure their staff and volunteers are citizens because confirming citizenship status is not

always easy. Poder Decl. 30, 33. These measures will divert critical resources from its petitioning program that would otherwise have been allocated to serving its mission. Poder Decl. ¶¶ 21, 22, 30, 33, 36. The Non-Citizen Ban also frustrates Poder’s efforts to work with potential staff and volunteers who are, in fact, U.S. citizens. Poder Decl. ¶ 29, 30, 31. There is no reliable government database for Plaintiffs to determine an employee or volunteer’s citizenship status. Poder Decl. ¶ 30. Even federal government officials routinely mistake persons’ status, because the central immigration database “‘frequently’ shows naturalized citizens as green card holders” and gives “no information on derivative citizenship,” which is why “many U.S. citizens become exposed to possible false arrest when ICE relies [] on deficient databases.” *Gonzalez v. Immigr. & Customs Enf’t*, 416 F.Supp.3d 995, 1004, 1018 (C.D. Cal. 2019), *rev’d and vacated on other grounds*, 975 F.3d 788 (9th Cir. 2020) (citation omitted). Difficulty determining status is a problem known to Florida, as reflected by recent reports about U.S. Immigration and Customs Enforcement<sup>1</sup> mistakenly targeting hundreds of incarcerated U.S. citizens in Miami-Dade County for deportation. In fact, the Law’s fines threaten initiative sponsors with substantial monetary liability, which has already chilled a sponsor’s partnership with Poder

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<sup>1</sup> ACLU of Florida, *Citizens on Hold: A Look at ICE’s Flawed Detainer System in Miami-Dade County* (Mar. 20, 2019), <https://www.acluf.org/en/publications/citizens-hold-look-ices-flawed-detainer-system-miami-dade-county>.

Latinx, Florida Decides Healthcare, a named plaintiff and initiative sponsor. Poder Decl. ¶ 34.

Fifth, the Law will impact and harm the communities and constituents that Poder serves. Due to the smaller applicant pool for citizen-only canvassers, effort Poder will have to expend to find and train new petition circulators, and the chilling effect of the severe penalties associated with the Non-Citizen Ban, Poder will engage substantially fewer citizens to sign initiative petitions than they could absent the Law. Poder Decl. ¶¶ 19, 20, 21, 22, 23, 24 35, 36, 37, 39. Poder works closely with Latino citizens to support their civic engagement, including by helping them sign initiative petitions, relying on community input to help shape the organization's agendas, and engaging community members to play a role in implementing their programs. Poder Decl. ¶¶ 8, 19. The Law will impact Latino voters who are part of the community and constituency that Poder serves through its initiative petition programs. Poder Decl. 18, 19, 35, 36, 37, 38, 39.

The Non-Citizen Ban also harms Mr. Orjuela Prieto and Ms. Lopez Garcia (the "Individual Plaintiffs") personally and financially by preventing them from circulating petitions in Florida. *See generally* Orjuela Prieto Decl.; *See generally* Lopez Garcia Decl. The Non-Citizen Ban will directly and substantially curtail the Individual Plaintiffs' constitutional rights to equal protection, free speech,



association, and due process, causing great harm to their interests. Both Individual Plaintiffs care deeply about the civic engagement and advancement of the Latino community. Orjuela Prieto Decl. ¶¶ 10, 14-18; Lopez Garcia Decl. ¶¶ 10, 12, 14-20. Both Individual Plaintiffs believe that the Latino community is under-served and that civic engagement is necessary to advance their individual and collective interests. Orjuela Prieto Decl. ¶¶ 10, 16, 17, 18; Lopez Garcia Decl. ¶¶ 10, 15-20. Individual Plaintiffs also believe that issues like the Medicaid expansion initiative are crucial initiatives and vehicles for driving positive change in their communities. Orjuela Prieto Decl. ¶¶ 15, 16; Lopez Garcia Decl. ¶¶ 9, 15. Both Individual Plaintiffs believe that since they are not eligible to vote themselves, it is crucial for them to be able to educate their voting-eligible community members about their right and ability to affect change via initiative petitions. Orjuela Prieto Decl. ¶ 18; Lopez Garcia Decl. ¶¶ 17. Stripping Individual Plaintiffs of the right to participate in petition circulating activities silences them and denies them a meaningful opportunity to civically engage on issues that impact their lives and their communities. Orjuela Prieto Decl. ¶¶ 14-18; Lopez Garcia Decl. ¶¶ 14-21. Moreover, they will lose income due to their inability to work as paid petition circulators for Poder. Orjuela Prieto Decl. ¶ 12, 13; Lopez Garcia Decl. ¶ 13. These harms severely prejudice the rights of Individual Plaintiffs.

## II. SUPPLEMENTAL ARGUMENT

### a. Poder Plaintiffs will suffer irreparable harm absent an injunction.

Both Poder and the Individual Plaintiffs will suffer—and have already suffered—irreparable harms to their First Amendment rights because of the Law’s onerous burdens on speech and association, and its facial citizenship-based classification. “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Elrod v. Burns*, 427 U.S. 347, 373 (1976). Indeed, “[e]ven a temporary infringement of First Amendment rights constitutes a serious and substantial injury.” *KH Outdoor v. City of Trussville*, 458 F.3d 1261, 1272 (11th Cir. 2006); *see also FF Cosmetics FL, Inc. v. City of Mia.Beach*, 866 F.3d 1290, 1298 (11th Cir. 2017) (“[A]n ongoing violation of the First Amendment constitutes an irreparable injury.”). That is because Plaintiffs’ harms “cannot be made whole by money damages and because [the Law] has [a] chilling effect on the free speech and associational rights of [Plaintiffs] and those similarly-situated.” *Towbin v. Antonacci*, 885 F.Supp.2d 1274, 1295 (S.D. Fla. 2012); *see also Clean-up ’84 v. Heinrich*, 590 F.Supp. 928 (M.D. Fla. 1984). “[T]he intangible nature of the benefits flowing” from these rights means that “if th[ey] are not jealously safeguarded, persons will be deterred ... from exercising [them] in the future.” *Cate v. Oldham*, 707 F.2d 1176, 1189 (11th Cir. 1983).

As discussed above, Poder has suspended its petition collection program in support of getting Medicaid expansion on the ballot, and if the Law goes into effect, will not proceed to significantly expand its efforts. Poder Decl. ¶¶ 20-22. Extinguished opportunities to gather petition signatures constitute irreparable harm. Interrupting petitioning operations causes organizations and their workforce to lose valuable time and opportunity to engage in “core political speech.” *Meyer v. Grant*, 486 U.S. 414, 422 (1988). This is because the Law “limits the number of voices who will convey [their] message and the hours they can speak and, therefore, limits the size of the audience they can reach.” *Id.* at 422-23. That also means Poder “will [] suffer irreparable injury distinct from the injuries of eligible voters” because “Plaintiffs’ organizational missions, including . . . mobilization efforts, will ... be frustrated and [] resources will be diverted” in response to the Law. *Ga. Coal. For the People’s Agenda v. Kemp*, 347 F.Supp.3d 1251, 1268 (N.D. Ga. 2018). Those “mobilization opportunities cannot be remedied once lost.” *Id.*

Individual Plaintiffs will also be irreparably harmed by the loss of their planned opportunity to engage in protected petitioning activities and will suffer such harm on the basis of their citizenship status. The Law will diminish their ability to speak and associate with their community at other events. Poder and other community-based organizations that engage in petitioning often integrate its

petitioning into events that educate or serve their communities in other ways, and the Non-Citizen Ban significantly deters organizations from including Individual Plaintiffs as non-citizens in any activity that could involve initiative petitioning. The self-censorship that the Law promotes will thus also carve Individual Plaintiffs out of activities that do not directly involve handling or collecting initiative petition forms, impeding Individual Plaintiffs' speech and associational activities.

The harm to the Poder Plaintiffs is and will continue to be irreparable. Its threatened impact has already imperiled Poder's funding, and absent an injunction, it will endanger their ability to continue petitioning operations altogether

**b. Plaintiffs will likely prevail on the merits.**

**i. Poder Plaintiffs have standing.**

Poder has organizational and associational standing, and the Individual Plaintiffs have individual standing to challenge H.B. 1205. To establish standing, a plaintiff "must show that she has suffered, or will suffer, an injury that is 'concrete, particularized, and actual or imminent; fairly traceable to the challenged action; and redressable by a favorable ruling.'" *Murthy v. Mo.*, 603 U.S. 43, 57 (2024).

**1. Poder has organizational standing.**

"[A]n organization has standing to sue when a defendant's illegal acts impair the organization's ability to engage in its own projects by forcing the organization

to divert resources in response.” *Arcia v. Fla. Sec’y of State*, 772 F.3d 1335, 1341 (11th Cir. 2014); see *Fla. State Conf. of N.A.A.C.P. v. Browning*, 522 F.3d 1153, 1165 (11th Cir. 2008) (organization’s diversion of personnel and time to respond to election law established organizational standing). Additionally, regarding First Amendment rights, “an actual injury can exist when the plaintiff is chilled from exercising [their] right to free expression or forgoes expression in order to avoid enforcement consequences.” *Bloedorn v. Grube*, 631 F.3d 1218, 1228 (11th Cir. 2011) (quoting *Pittman v. Cole*, 267 F.3d 1269, 1283 (11th Cir. 2001)).

Here, Poder’s injury is concrete, particular, and actual: compliance with the Non-Citizen Ban has already prevented Poder from continuing its initiative petition efforts on Medicaid expansion. Poder has been forced to halt its initiative petition program because, before the passage of H.B.1205, it was planning to utilize a workforce pool that included mostly non-citizens. Poder Decl. ¶ 16. In searching for citizen-only canvassers, and vetting their citizenship, Poder will have to divert time and resources from ballot initiative activities that are central to Poder’s mission. Poder Decl. ¶¶ 22, 30-31, 33. See *Arcia*, 772 F.3d at 1341.

Moreover, Poder has been chilled from exercising its First Amendment rights of speech and expression. “[T]he circulation of a petition involves the type of interactive communication concerning political change that is appropriately

described as ‘core political speech.’” *Grant*, 486 U.S. at 421-22 (1988). Poder has halted its initiative petition program to avoid violating the Law and has thus suffered injury to its First Amendment rights. *See Bloedorn*, 631 F.3d at 1228.

Furthermore, this halting of its initiative program hinders Poder’s ability to fulfil its organizational goals. *See Fla. Democratic Party v. Hood*, 342 F. Supp. 2d 1073, 1079 (N.D. Fla. 2004) (“[A]n organization has standing to challenge conduct that impedes its ability to attract members, to raise revenues, or to fulfill its purposes.”). Specifically, prior to the passage of H.B. 1205, Poder’s petitioning program was a key vehicle for the organization to achieve its goals of increasing Latino civic engagement. Poder Decl. ¶¶ 7, 12-13. Its petitioning activities were also critical to fulfilling its organizational purpose because the Medicaid for All initiative campaign was part of Poder’s efforts to advocate for economic justice and immigrants’ rights. Poder Decl. ¶ 13. Due to the passage of H.B. 1205, Poder has had to halt democratic activities that further its economic and immigrant justice messaging.

These injuries are directly traceable to and a result of the passage of H.B. 1205. And a favorable ruling in this case would result in prohibiting enforcement of the Law, which would redress Poder’s injury by allowing it to resume its initiative petition efforts with its existing pool of canvassers and to continue its mission of

civically engaging Latinos, inclusive of immigrants. Poder thus has organizational standing to challenge H.B.1205.

## **2. Poder has associational standing.**

Poder asserts associational standing based on the impacts of HB 1205 to its workforce and to the constituency in the Florida Latino community Poder represents. It is well-established that a plaintiff may assert standing on behalf of a third party if the following requirements are met: “(1) an injury-in-fact to the [organization], and (2) a close relationship to the third-party, and (3) a hindrance to the third-party’s ability to assert its own interests.” *Fla. State Conf. Of the NAACP*, CASE NO. 4:07CV-402-SPM/WCS, 2007 WL 9697660 at \*3 (N.D. Fla. Dec 18, 2007) (citing *Powers v. Ohio*, 499 U.S. 400, 410-411 (1991)). Indeed, even absent injury to members, a voting rights organization can still have standing “on behalf of non-member registrants who will be denied the right to vote.” *Id.* It is also well-established that a non-member organization has standing to sue on behalf of its constituents where the organization serves a “segment of the . . . community which is the primary beneficiary of its activities.” *Doe v. Stincer*, 175 F.3d 879, 885 (11th Cir. 1999) (citing *Hunt v. Wash. State Apple Advertising Comm’n*, 432 U.S. 333, 344 (1977)).

Poder has satisfied each of these elements of associational standing on behalf of the constituency it serves. First, Poder has asserted an injury in fact to itself as an organization from the impacts the Non-Citizen Ban has already had and will continue to have on its initiative petition program.

Second, Poder has a close relationship to the Latino community. Poder is a key advocacy organization with the Latino community. The Latino community shapes Poder's agenda and relies on Poder to advocate for its interests. Poder Decl. ¶¶ 19, 37. Poder thus "has a close relationship with the minority community members who participate in" Poder's initiative petition program. *Fla. State Conf. of the NAACP*, 2007 WL 9697660 at \*3. Associational standing is appropriate because Poder serves a "specialized segment of the . . . community which is the primary beneficiary of its activities." *Doe v. Stincer*, 175 F.3d 879, 885 (11th Cir. 1999). Moreover, Poder has standing to assert the interests of its employees whose First Amendment rights are violated by the Non-Citizen Ban. *See White Place, Inc. v. Glover*, 222 F.3d 1327, 1330 (11th Cir. 2000) (holding that "a business may assert the First Amendment rights of its employees where 'violation of those rights adversely affects'" the interests of the business.)

As to the third prong, the Non-Citizen Ban imposes a direct and immediate hindrance to the ability of the Latino community to advocate for its interests, since



the ban will explicitly bar non-citizen members of this community from participating in initiative campaigns and will prevent valid U.S. citizens from participating due to the burden of verifying citizenship. Poder Decl. ¶¶ 31-23, 37-38. *See also League of Women Voters of Fla., Inc. v. Lee*, 595 F. Supp. 3d 1042, 1155 (N.D. Fla 2022) (finding disability rights organization had standing to challenge restriction vote by mail process based on impacts to its non-member constituents) (*rev'd and vacated on other grounds*). Similarly, Poder's constituents lack the financial means to represent themselves, and may legitimately fear retaliation or reprisal if they act in their own names. *See Council of Insurance Agents and Brokers v. Gallagher*, 287 F. Supp. 2d 1302, 1309 (N.D. Fla. 2003).

Thus, Poder has both organizational and associational standing to join the above-referenced motions for preliminary injunction in this case.

**3. Humberto Orjuela Prieto and Yivian Lopez Garcia  
have individual standing.**

Both Ms. Lopez Garcia and Mr. Orjuela Prieto have the requisite injury in fact to challenge H.B. 1205's Non-Citizen Ban. "Litigants who are being 'chilled from engaging in constitutional activity' ... suffer a discrete harm independent of enforcement, and that harm creates the basis for our jurisdiction." *Speech First v. Cartwright*, 32 F.4th 1110, 1120 (11th Cir. 2022). Here, but for the Non-Citizen Ban,

both Individual Plaintiffs intend to work as paid petition circulators collecting signatures in support of Poder's Medicaid expansion initiative. *See Dream Defs. v. Governor of the State of Fla.*, 57 F.4th 879, 887 (11th Cir. 2023), *certified question answered sub nom. DeSantis v. Dream Defs.*, 389 So. 3d 413 (Fla. 2024) (for an injury to be sufficiently imminent to permit pre-enforcement review, "the plaintiff must have 'an intention to engage in a course of conduct arguably affected with a constitutional interest, but proscribed by a statute'"). The Law's limitations on non-citizen assistance in ballot initiative activities, and associated criminal penalties, thus chill Ms. Lopez Garcia and Mr. Orjuela Prieto's First Amendment activities. Their First Amendment speech and associational rights will be infringed, as they will be unable to support Poder's petitioning work and to speak to eligible voters about such efforts. Moreover, if the Non-Citizen Ban remains in effect, they will both lose income that they are counting on to pay bills. Their injuries are thus sufficiently concrete, particularized, and imminent.

Additionally, there is no question that their injuries are traceable to the challenged law—H.B.1205 is the but-for cause of their inability to support Poder's ballot initiative work. And a favorable ruling, in this case barring the enforcement of the Non-Citizen Ban, would allow them to continue their plans for such work.

Accordingly, the relief sought would redress their injury. Mr. Orjuela Prieto and Ms. Lopez Garcia thus have individual standing.

#### **4. Plaintiffs' First Amendment and Equal Protection**

##### **Claims will likely succeed.**

With respect to the likelihood of success on their First Amendment and Equal Protection claims, the Poder Plaintiffs join and incorporate the arguments set forth in the Motion for Preliminary Injunction filed by FloridaRightToCleanWater.org *et al.*, Docket Number 173-1 on pages 17-23 insofar as they pertain to the Non-Citizen Ban. Poder Plaintiffs also join and incorporate the arguments set forth in the Motion for Preliminary Injunction filed by the League of Women Voters Florida *et al.*, Docket Number 175-1 on pages 5-13, insofar as they pertain to the Non-Citizen Ban.

##### **b. The public interest and balance of hardships favor injunctive relief.**

With respect to the public interest and balance of hardships, the Poder Plaintiffs join and incorporate the arguments set forth in the Motion for Preliminary Injunction filed by FloridaRightToCleanWater.org *et al.*, Docket Number 173-1 on pages 40-41 insofar as they pertain to the Non-Citizen Ban. Poder Plaintiffs also join and incorporate the arguments set forth in the Motion for Preliminary Injunction filed by the League of Women Voters Florida *et al.*, Docket Number 175-1 on pages 26-27, insofar as they pertain to the Non-Citizen Ban.

### III. CONCLUSION

For these reasons, Plaintiffs Poder Latinx, Humberto Orjuela Prieto, and Yivian Lopez Garzia request that this Court join them to FloridaRightToCleanWater.org *et al.* and the League of Women Voters Florida *et al.*'s motions for preliminary injunction insofar as they pertain to the Non-Citizen Ban in H.B. 1205.

Respectfully submitted on this day June 17, 2025

/s/Jeremy C. Karpatkin

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**LOCAL RULE 7.1(B) CERTIFICATION**

On June 6, 2025, counsel for Proposed Intervenor conferred with counsel for parties for Florida Decides Health Care, *et al.*, who do not oppose.

/s/ Cesar Z. Ruiz

Cesar Z. Ruiz

*Counsel for Plaintiffs*

**LOCAL RULE 7.1(F) CERTIFICATION**

The undersigned counsel certifies, pursuant to N.D. Fla. Loc. R. 7.1(F), that this Motion and Memorandum contain 4137 words, excluding the case style, signature block, and Local Rule 7.1 Certificate.

/s/ Jeremy C. Karpatkin

Jeremy C. Karpatkin

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

/s/ Jeremy C. Karpatkin

Jeremy C. Karpatkin

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