

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:26-cv-22257-JB

Case No. 1:26-cv-23135-JB

UNIDOSUS, *et al.*,

Plaintiffs,

v.

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

Defendants.

FLORIDA STATE CONFERENCE OF
BRANCHES AND YOUTH UNITS OF
THE NAACP, *et al.*,

Plaintiffs,

v.

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

Defendants.

**THE SUPERVISORS OF ELECTIONS' ANSWER
TO UNIDOSUS PLAINTIFFS' FIRST AMENDED COMPLAINT**

Defendants, Florida's sixty-seven Supervisors of Elections (the Supervisors), answer the First Amended Complaint (ECF No. 89) filed by Plaintiffs, UnidosUS, League of Women Voters of Florida, Inc., League of Women Voters of Florida Education Fund, Inc., Florida Rising Together, Florida Rising, Inc., Hispanic Federation, Florida Immigrant Coalition, FLIC Votes, Inc., Common Cause, and Common Cause Education Fund.

1. Admitted that Florida enacted House Bill 991 and that the challenged provisions of HB 991 become effective on January 1, 2027. The second sentence of this paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions. As to the remainder of this paragraph, without knowledge and therefore denied.

2. The first sentence of this paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions. As to the remainder of this paragraph, without knowledge and therefore denied.

3. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

4. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

5. Without knowledge and therefore denied.

6. Without knowledge and therefore denied.

7. Without knowledge and therefore denied.

8. Admitted that Plaintiffs challenge four provisions of House Bill 991. The remainder of this paragraph purports to summarize provisions of HB 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

9. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

10. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

11. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

12. Without knowledge and therefore denied.

13. Without knowledge and therefore denied.

14. This paragraph purports to summarize provisions of the National Voter Registration Act (NVRA). The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

15. This paragraph purports to summarize provisions of the NVRA. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

16. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

17. Without knowledge and therefore denied.

18. Without knowledge and therefore denied.

19. Without knowledge and therefore denied.
20. Without knowledge and therefore denied.
21. Denied that 42 U.S.C. § 1983 and 52 U.S.C. § 20510 are jurisdictional statutes.

The remainder of this paragraph is admitted.

22. Admitted.
23. Admitted.
24. Admitted for venue purposes only.
25. Without knowledge and therefore denied.
26. Without knowledge and therefore denied.
27. Without knowledge and therefore denied.
28. Without knowledge and therefore denied.
29. Without knowledge and therefore denied.
30. Without knowledge and therefore denied.
31. Without knowledge and therefore denied.
32. Without knowledge and therefore denied.
33. Without knowledge and therefore denied.
34. Without knowledge and therefore denied.
35. Without knowledge and therefore denied.
36. Without knowledge and therefore denied.
37. Without knowledge and therefore denied.
38. Without knowledge and therefore denied.
39. Without knowledge and therefore denied.
40. Without knowledge and therefore denied.

41. Without knowledge and therefore denied.
42. Without knowledge and therefore denied.
43. Without knowledge and therefore denied.
44. Without knowledge and therefore denied.
45. Without knowledge and therefore denied.
46. Without knowledge and therefore denied.
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61. Without knowledge and therefore denied.
62. Without knowledge and therefore denied.
63. Without knowledge and therefore denied.

64. Without knowledge and therefore denied.
65. Without knowledge and therefore denied.
66. Without knowledge and therefore denied.
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82. Without knowledge and therefore denied.
83. Without knowledge and therefore denied.
84. Without knowledge and therefore denied.
85. Without knowledge and therefore denied.
86. Without knowledge and therefore denied.

87. Without knowledge and therefore denied.

88. Without knowledge and therefore denied.

89. Without knowledge and therefore denied.

90. Without knowledge and therefore denied.

91. Without knowledge and therefore denied.

92. Without knowledge and therefore denied.

93. The first sentence of this paragraph is admitted. The remainder of this paragraph purports to summarize provisions of the Florida Election Code, House Bill 991, and the NVRA. The Supervisors refer to those statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

94. Admitted that David Kerner is sued in his official capacity as the executive director of the Department of Highway Safety and Motor Vehicles (DHSMV). Denied that David Kerner is the head of DHSMV. *See* Fla. Stat. § 20.24(1). The remainder of this paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

95. Admitted that Kathryn Williams is the Deputy Secretary of the Florida Department of Children and Families and that she is sued in her official capacity. As to the remainder of this paragraph, without knowledge and therefore denied.

96. The first sentence of this paragraph is admitted. As to the second sentence of this paragraph, admitted that, within their respective counties, the Supervisors perform the election-administration functions that the Florida Election Code delegates to them. The remainder of this paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those

provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

97. Admitted.

98. Admitted that the Plaintiffs challenge four provisions of House Bill 991 relating to proof of citizenship. As to the remainder of this paragraph, without knowledge and therefore denied.

99. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

100. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

101. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

102. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

103. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

104. The first two sentences of this paragraph are admitted. The remainder of the paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those

provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

105. This paragraph purports to summarize a provision of House Bill 991. The Supervisors refer to that provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision.

106. This paragraph purports to summarize a provision of House Bill 991. The Supervisors refer to that provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision. As to the remainder of this paragraph, without knowledge and therefore denied.

107. Without knowledge and therefore denied.

108. This paragraph purports to summarize provisions of the Help America Vote Act (HAVA). The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

109. This paragraph purports to summarize provisions of HAVA. The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

110. This paragraph purports to summarize provisions of HAVA. The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

111. Without knowledge and therefore denied.

112. The first sentence of this paragraph is admitted. As to the remainder of this paragraph, including footnote 5, without knowledge and therefore denied.

113. Without knowledge and therefore denied.

114. Without knowledge and therefore denied.

115. Without knowledge and therefore denied.

116. Without knowledge and therefore denied.

117. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

118. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

119. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

120. This paragraph purports to summarize a provision of the Florida Election Code. The Supervisors refer to the referenced statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision.

121. Without knowledge and therefore denied.

122. Without knowledge and therefore denied.

123. This paragraph purports to summarize a court decision. The Supervisors refer to the full opinion for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that opinion. As to the remainder of this paragraph, without knowledge and therefore denied.

124. Without knowledge and therefore denied.

125. Without knowledge and therefore denied.

126. Without knowledge and therefore denied.

127. The Charlotte County Supervisor of Elections admits that the information in the last sentence of this paragraph was true at the time the Supervisor was interviewed for the news article referenced in footnote 23. As for the remaining Supervisors, without knowledge and therefore denied.

128. Without knowledge and therefore denied.

129. Without knowledge and therefore denied.

130. Without knowledge and therefore denied.

131. Without knowledge and therefore denied.

132. This paragraph purports to summarize a statutory provision. The Supervisors refer to the referenced statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision. As to the remainder of this paragraph, without knowledge and therefore denied.

133. Without knowledge and therefore denied.

134. Without knowledge and therefore denied.

135. This paragraph purports to summarize a statutory provision of the Commonwealth of Puerto Rico. The Supervisors refer to the referenced statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision. As to the remainder of this paragraph, including footnote 29, without knowledge and therefore denied.

136. Without knowledge and therefore denied.

137. Admitted that in August 2018, 32 Supervisors were sued by a group of voters and that the parties entered into a settlement agreement. As to the remainder of this paragraph, without knowledge and therefore denied.

138. Without knowledge and therefore denied.

139. This paragraph, including footnote 38, purports to summarize a statutory provision. The Supervisors refer to the referenced statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision. As to the remainder of this paragraph, including footnote 38, without knowledge and therefore denied.

140. Without knowledge and therefore denied.

141. Without knowledge and therefore denied.

142. Without knowledge and therefore denied.

143. Without knowledge and therefore denied.

144. Without knowledge and therefore denied.

145. Without knowledge and therefore denied.

146. Without knowledge and therefore denied.

147. Without knowledge and therefore denied.

148. Without knowledge and therefore denied.

149. This paragraph, including footnote 48, purports to summarize U.S. Department of State guidance documents concerning how to obtain a U.S. passport. The Supervisors refer to those documents for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those documents.

150. This paragraph, including footnotes 49, 50, 51, and 52, purports to summarize U.S. Department of State guidance documents concerning how to obtain a U.S. passport. The Supervisors refer to those documents for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those documents.

151. This paragraph, including footnote 53, purports to summarize U.S. Department of State guidance documents concerning how to obtain a U.S. passport. The Supervisors refer to those documents for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those documents.

152. Without knowledge and therefore denied.

153. Without knowledge and therefore denied.

154. Without knowledge and therefore denied.

155. Without knowledge and therefore denied.

156. Without knowledge and therefore denied.

157. Without knowledge and therefore denied.

158. Without knowledge and therefore denied.

159. Without knowledge and therefore denied.

160. Without knowledge and therefore denied.

161. Without knowledge and therefore denied.

162. Without knowledge and therefore denied.

163. Without knowledge and therefore denied.

164. This paragraph purports to summarize a provision of House Bill 991. The Supervisors refer to that provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision.

165. Without knowledge and therefore denied.

166. Without knowledge and therefore denied.

167. Without knowledge and therefore denied.

168. Without knowledge and therefore denied.

169. Without knowledge and therefore denied.

170. Without knowledge and therefore denied.

171. Without knowledge and therefore denied.

172. Without knowledge and therefore denied.

173. Without knowledge and therefore denied.

174. Without knowledge and therefore denied.

175. Without knowledge and therefore denied.

176. Without knowledge and therefore denied.

177. Without knowledge and therefore denied.

178. Without knowledge and therefore denied.

179. Without knowledge and therefore denied.

180. Without knowledge and therefore denied.

181. Without knowledge and therefore denied.

182. Without knowledge and therefore denied.

183. This paragraph purports to summarize provisions of House Bill 991 and a provision of the Florida Election Code. The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

184. This paragraph purports to summarize a provision of the Florida Election Code. The Supervisors refer to the referenced statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision.

185. Without knowledge and therefore denied.

186. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

187. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions. As to the remainder of this paragraph, without knowledge and therefore denied.

188. Without knowledge and therefore denied.

189. Without knowledge and therefore denied.

190. Without knowledge and therefore denied.

191. Without knowledge and therefore denied.

192. Without knowledge and therefore denied.

193. Without knowledge and therefore denied.

194. Without knowledge and therefore denied.

195. Without knowledge and therefore denied.

196. Without knowledge and therefore denied.

197. Without knowledge and therefore denied.

198. Without knowledge and therefore denied.

199. Without knowledge and therefore denied.

200. Without knowledge and therefore denied.

201. Without knowledge and therefore denied.

202. Without knowledge and therefore denied.

203. Without knowledge and therefore denied.

204. Without knowledge and therefore denied.

205. Without knowledge and therefore denied.

206. Without knowledge and therefore denied.

207. Without knowledge and therefore denied.

208. Without knowledge and therefore denied.

209. Without knowledge and therefore denied.

210. Without knowledge and therefore denied.

211. Without knowledge and therefore denied.

212. Without knowledge and therefore denied.

213. The first sentence of this paragraph, including footnote 77, purports to summarize provisions of the Florida Department of State's Polling Place Procedures Manual. The Supervisors refer to the referenced manual for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with this manual. As to the remainder of this paragraph, without knowledge and therefore denied.¹

¹ The Broward County Supervisor admits that its official website, under the section addressing acceptable voter identification, states: "ID required and checked at the polls is used solely to confirm the voter's identity, not to verify the voter's ID number or address. The photograph on the ID is compared to the person standing before the Election Day Worker and the signature on the ID is compared to the signature on record." The website speaks for itself, and the

214. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

215. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

216. Without knowledge and therefore denied.

217. Without knowledge and therefore denied.

218. Without knowledge and therefore denied.

219. Without knowledge and therefore denied.

220. This paragraph purports to summarize provisions of the Florida Election Code. The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

221. Without knowledge and therefore denied.

222. Without knowledge and therefore denied.

223. Without knowledge and therefore denied.

224. The Supervisors incorporate their answers to paragraphs 1 through 94, 96 through 182, 194 through 195, 197 through 203, and 217 through 218.

Broward County Supervisor refers to the website for its complete and accurate contents. To the extent this paragraph 213 is inconsistent with the foregoing or otherwise characterizes the contents of the website, those allegations are denied.

225. This paragraph purports to summarize two court decisions. The Supervisors refer to the full opinions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those opinions.

226. This paragraph purports to summarize two court decisions. The Supervisors refer to the full opinions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those opinions.

227. Without knowledge and therefore denied.

228. Without knowledge and therefore denied.

229. Without knowledge and therefore denied.

230. Without knowledge and therefore denied.

231. Without knowledge and therefore denied.

232. This paragraph purports to summarize a provision of House Bill 991. The Supervisors refer to that provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision. As to the remainder of this paragraph, without knowledge and therefore denied.

233. Without knowledge and therefore denied.

234. Without knowledge and therefore denied.

235. Without knowledge and therefore denied.

236. Without knowledge and therefore denied.

237. The first sentence of this paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization

inconsistent with those provisions. As to the remainder of this paragraph, without knowledge and therefore denied.

238. Without knowledge and therefore denied.

239. The last sentence of this paragraph purports to summarize a provision of House Bill 991. The Supervisors refer to the referenced statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision. As to the remainder of this paragraph, without knowledge and therefore denied.

240. Without knowledge and therefore denied.

241. Without knowledge and therefore denied.

242. Without knowledge and therefore denied.

243. Without knowledge and therefore denied.

244. Without knowledge and therefore denied.

245. Without knowledge and therefore denied.

246. Without knowledge and therefore denied.

247. The Supervisors incorporate their answers to paragraphs 1 through 24, 68 through 79, 93 through 94, 96, 183, and 222 through 223.

248. This paragraph purports to summarize a provision of the NVRA. The Supervisors refer to that statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision.

249. This paragraph purports to summarize a provision of the NVRA. The Supervisors refer to that statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision.

250. This paragraph purports to summarize provisions of House Bill 991 and a provision of the Florida Election Code. The Supervisors refer to the referenced statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

251. Without knowledge and therefore denied.

252. Without knowledge and therefore denied.

253. Without knowledge and therefore denied.

254. The Supervisors incorporate their answers to paragraphs 1 through 94, 96 through 105, and 222 through 223.

255. This paragraph purports to summarize provisions of the NVRA and a provision from the Code of Federal Regulations. The Supervisors refer to the referenced statutory and rule provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions. As to the remainder of this paragraph, without knowledge and therefore denied.

256. This paragraph purports to summarize a court decision. The Supervisors refer to the full opinion for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that opinion.

257. This paragraph purports to summarize a provision of the NVRA. The Supervisors refer to that statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision.

258. This paragraph purports to summarize provisions of House Bill 991. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

259. Without knowledge and therefore denied.

260. The Supervisors incorporate their answers to paragraphs 1 through 30, 93 through 94, 96 through 105, and 222 through 223.

261. This paragraph purports to summarize provisions of the NVRA. The Supervisors refer to those statutory provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

262. This paragraph purports to summarize court decisions. The Supervisors refer to the full opinions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those opinions.

263. Without knowledge and therefore denied.

264. Without knowledge and therefore denied.

265. The Supervisors incorporate their answers to paragraphs 1 through 24, 31 through 79, 93 through 105, and 222 through 223.

266. This paragraph purports to summarize provisions of the NVRA. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

267. This paragraph purports to summarize provisions of the NVRA. The Supervisors refer to those provisions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those provisions.

268. Without knowledge and therefore denied.

269. The Supervisors incorporate their answers to paragraphs 1 through 94, 96 through 182, and 222 through 223.

270. Without knowledge and therefore denied.

271. This paragraph purports to summarize a provision of the NVRA. The Supervisors refer to that statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision.

272. This paragraph purports to summarize court decisions. The Supervisors refer to the full opinions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those opinions.

273. Without knowledge and therefore denied.

274. This paragraph purports to summarize a court decision. The Supervisors refer to the full opinion for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that opinion. As to the remainder of the paragraph, without knowledge and therefore denied.

275. This paragraph purports to summarize a statutory provision of the Commonwealth of Puerto Rico. The Supervisors refer to the referenced statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision. As to the remainder of this paragraph, including footnote 81, without knowledge and therefore denied.

276. Without knowledge and therefore denied.

277. Without knowledge and therefore denied.

278. Without knowledge and therefore denied.

279. Without knowledge and therefore denied.

280. Without knowledge and therefore denied.

281. Without knowledge and therefore denied.

282. Without knowledge and therefore denied.

283. This paragraph purports to summarize court decisions. The Supervisors refer to the full opinions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those opinions. As to the remainder of this paragraph, without knowledge and therefore denied.

284. This paragraph purports to summarize a court decision. The Supervisors refer to the full opinion for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that opinion. As to the remainder of the paragraph, without knowledge and therefore denied.

285. Without knowledge and therefore denied.

286. Without knowledge and therefore denied.

287. This paragraph purports to summarize a provision of the NVRA. The Supervisors refer to that statutory provision for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that provision.

288. This paragraph purports to summarize a court decision. The Supervisors refer to the full opinion for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that opinion. As to the remainder of the paragraph, without knowledge and therefore denied.

289. This paragraph purports to summarize a court decision. The Supervisors refer to the full opinion for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that opinion.

290. Without knowledge and therefore denied.

291. The Supervisors incorporate their answers to paragraphs 1 through 24, 50 through 79, 93, 96, and 184 through 221.

292. This paragraph purports to summarize two court decisions. The Supervisors refer to the full opinions for a complete and accurate statement of their content and deny any allegation, inference, or characterization inconsistent with those opinions.

293. This paragraph purports to summarize a court decision. The Supervisors refer to the full opinion for a complete and accurate statement of its content and deny any allegation, inference, or characterization inconsistent with that opinion.

294. Without knowledge and therefore denied.

295. Without knowledge and therefore denied.

296. Without knowledge and therefore denied.

The Supervisors deny all allegations not specifically admitted. The Supervisors also deny all footnotes not specifically admitted. To the extent the headings and request for relief in Plaintiffs' First Amended Complaint (ECF No. 89) contain allegations that require a response, those allegations are denied.

Dated August 11, 2026.

Respectfully submitted,

/s/ John T. LaVia, III

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