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

Case No. 26-cv-22257-JB/Torres

UNIDOSUS, *et al.*,

Plaintiffs,

v.

CORD BYRD, *etc., et al.*,

Defendants.

_____/

UNIDOSUS PLAINTIFFS' RESPONSE TO
STATE DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY

Notwithstanding State Defendants' claims, *see* Dkt. No. 147, the Supreme Court's emergency stay order in *Department of Homeland Security v. League of Women Voters* ("*DHS*"), No. 26A308 (U.S. Sep. 25, 2026), Dkt. No. 147-1, has no bearing on Plaintiffs' motions to dismiss. Plaintiffs' NVRA claims are not implicated by *DHS*, which only addressed whether the modified SAVE program violated the Social Security Act, Privacy Act, or Administrative Procedure Act. *Id*. at 5.

Moreover, the order at issue in *DHS* "vacated the modified SAVE program and its related notices," *id*. at 3,[1] but here, Plaintiffs do not challenge Florida's use of SAVE in all circumstances. Instead, they challenge its use for systematic list maintenance during the NVRA's 90-day quiet period—which the Supreme Court expressly stated was unaffected by the ruling and "limits the potential impact" of its stay order. *Id.* at 6 & n.2. While systematic list maintenance within the quiet period was not at issue in *DHS*, it is mandated by HB 991, directly violating the NVRA.

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[1] Florida was not covered by the district court's injunction and received no relief from its suspension.

Respectfully submitted October 7, 2026,

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