

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

KATE CALVIN, JOHN NELSON,
CHARLES J. PARRISH, LONNIE GRIFFIN
and CONCERNED UNITED PEOPLE,

Plaintiffs,

vs.

CASE NO.: 4:15-CV-00131-MW-CAS

JEFFERSON COUNTY BOARD OF
COMMISSIONERS, JEFFERSON COUNTY
SCHOOL BOARD and MARTY BISHOP,
SUPERVISOR OF ELECTIONS, in his
official capacity,

Defendants.

**DEFENDANT JEFFERSON COUNTY SCHOOL BOARD'S RESPONSE TO
PLAINTIFFS' FIRST REQUESTS FOR ADMISSIONS AND
SECOND REQUEST FOR PRODUCTION**

Defendant, Jefferson County School Board, (School Board) responds to the "Plaintiffs' First Requests for Admissions and Second Request for Production" as follows.

1. The School Board admits requests for admissions 1, 4, 5, 6, 7, 8, 9, 10, 11 and 12.
2. The School Board denies requests for admissions 2 and 3. The majority of persons incarcerated at JCI are residents of Jefferson County according to the U.S. Census and are residents of Jefferson County for purposes of redistricting under Florida law.

Respectfully submitted this 21st day of August, 2015.

/s/ Gerald B. Curington
GERALD B. CURINGTON
Florida Bar No. 224170
AUSLEY McMULLEN, P.A.
P.O. Box 391 (32302)
123 S. Calhoun Street
Tallahassee, FL 32301
Telephone: (850) 425-5342
Fax: (850) 222-7560
E-Mail: jcurington@ausley.com

Attorneys for Defendant,
Jefferson County School Board

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2015, a true copy of the foregoing document was furnished by e-mail to Nancy G. Abudu at nabudu@aclufl.org; Shalini Goel Agarwal at sagarwal@aclufl.org; Randall C. Berg, Jr. at rberg@FloridaJusticeInstitute.org; Dante P. Trevisani at dtrevisani@FloridaJusticeInstitute.org (Counsel for Plaintiffs); Zachery A. Scharlepp at zscharlepp@rumberger.com; Linda Bond Edwards at ledwards@rumberger.com; and docketingorlando@rumberger.com (Counsel for Defendants Jefferson County Board of Commissioners and Marty Bishop).

/s/ Gerald B. Curington
Gerald B. Curington