

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

Common Cause Florida, FairDistricts
Now, Florida State Conference of the
National Association for the
Advancement of Colored People
Branches, Cassandra Brown, Peter
Butzin, Charlie Clark, Dorothy Inman-
Johnson, Veatrice Holifield Farrell,
Brenda Holt, Rosemary McCoy, Leo R.
Stoney, Myrna Young, and Nancy
Ratzan,

Plaintiffs,

v.

Cord Byrd, in his official capacity as
Florida Secretary of State,

Defendant.

Case No. 4:22-cv-109-AW-MAF

**DECLARATION OF ALVIN LI IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO MOTIONS TO QUASH**

ALVIN LI hereby declares under penalty of perjury pursuant to 28 U.S.C. §
1746 as follows:

1. I am admitted in this action *pro hac vice* and an attorney at
Patterson Belknap Webb & Tyler LLP, attorneys for Plaintiffs in the above-
captioned action. I submit this declaration in further support of Plaintiffs’
opposition to two pending motions to quash, Dkt. Nos. 126 & 128.

2. Attached as **Exhibit 1** is a true and correct copy of Notices of Deposition issued by Defendants to 24 current or former members of the Florida House and 9 current or former members of the Florida Senate in *Black Voters Matter Capacity Building Institute, Inc. v. Byrd*, Case No. 2022-CA-000666. These documents were obtained from counsel for Plaintiffs in that action.


3. Attached as **Exhibit 2** is a true and correct copy of email correspondence between Ryan Newman, General Counsel for the Office of Governor Ron DeSantis, and Jason Torchinsky (copying Joshua Pratt, Nicholas Meros, and Mohammad Jazil) dated February 12, 2022.

4. Attached as **Exhibit 3** is a true and correct copy of email correspondence between Ryan Newman and Robert Popper (copying Joshua Pratt, Nicholas Meros, Jason Torchinsky, and Mohammad Jazil) dated February 12-13, 2022.

5. Attached as **Exhibit 4** is a true and correct copy of email correspondence between Joshua Pratt, Deputy General Counsel for the Office of Governor DeSantis, Christina Pushaw, Press Secretary for the Office of Governor DeSantis, Ryan Newman, and Dan McLaughlin, Senior Writer at the National Review (copying Mohammad Jazil and Taryn M. Fenske) dated February 21-22, 2022.

6. The documents contained in **Exhibits 2-4** were obtained from public records requests made by American Oversight, a nonprofit government oversight organization located in Washington, D.C.

Dated: February 16, 2023
New York, New York



Alvin Li