

**IN THE UNITED STATES DISTRICT COURT  
FOR THE 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

**PLAINTIFFS' OBJECTIONS AND RESPONSES TO DEFENDANT'S  
FIRST REQUEST FOR PRODUCTION TO ORGANIZATIONAL  
PLAINTIFFS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Common Cause Florida hereby objects and responds to the first set of requests for production to the Organizational Plaintiffs (the "Requests") served by Defendant Cord Byrd, in his official capacity as Florida Secretary of State, as follows:

### **GENERAL OBJECTIONS**

Common Cause Florida makes the following General Objections, which apply to each and every Request, and are incorporated by reference in each and every response below as if set forth fully therein. Failure to reiterate a General Objection below does not constitute a waiver of that or any other objection.

Common Cause Florida's responses as set forth below are based upon the information that is currently available to Common Cause Florida. Common Cause Florida specifically reserves the right to supplement, correct, and amend these responses in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, and any applicable court order. Common Cause Florida further reserves the right to introduce at trial, or any proceedings, any evidence from any source and testimony from any witness.

1. Common Cause Florida generally objects to the Requests, Definitions, and Instructions to the extent that they purport to impose obligations on Common Cause Florida in excess of those imposed by Federal Rules of Civil Procedure 26 and 34 and any other applicable rule or law. Common Cause Florida will respond in accordance with its obligations under the applicable rules.

2. Common Cause Florida objects to the Requests to the extent each Request seeks information that is neither relevant to a claim or defense or to the subject matter of this litigation, and to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence. Any response Common Cause Florida makes to any Request shall not be deemed an admission that the response, information, document, or thing produced is relevant to a claim or defense or to the subject matter of this litigation, is reasonably calculated to lead to the

discovery of admissible evidence, is material, or is admissible as evidence. To the extent the Requests seek information not relevant to any party's claim or defense, Common Cause Florida further objects to the Requests as unduly burdensome and/or oppressive.

3. Common Cause Florida objects to the Requests to the extent that they are vague, ambiguous, overly broad or confusing and therefore not susceptible to a clear and definitive answer. To the extent possible, Common Cause Florida have interpreted vague and ambiguous requests. However, Common Cause Florida cannot guarantee that their interpretation is in all cases consistent with the intent of the drafter.

4. Common Cause Florida reserves all objections to the admissibility at trial of any information or documents identified herein. The supplying of any information will not constitute an admission by Common Cause Florida that such information is relevant to or admissible in the pending litigations. Common Cause Florida reserves the right to objects to further inquiry with respect to any subject matter.

5. Common Cause Florida objects to the Requests to the extent they seek disclosure of any information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. The inadvertent production by Common Cause Florida of material protected by any privilege, immunity, or protective doctrine shall not constitute, or be considered as a factor suggesting, a waiver or impairment of any claims of such protection.

6. Common Cause Florida objects to the Requests to the extent they seek information that is not in the possession, custody, or control of Common Cause Florida.

7. Common Cause Florida objects to the Requests to the extent they seek information in the possession, custody, or control of Defendant, or are publicly available to the

Defendant, or to the extent that the documents or information is obtainable from sources other than Common Cause Florida that are more convenient, less burdensome, or less expensive.

8. Common Cause Florida objects to the Requests to the extent that each Request seeks disclosure of confidential information or personal protected information protected from disclosure by law. Common Cause Florida will not disclose any confidential information or personal protected information to the extent such disclosure would violate a confidentiality agreement, court order, or applicable law.

9. Common Cause Florida objects to the Requests as overbroad, unduly burdensome, and requesting documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence to the extent that each Request seeks production of “all” documents, correspondence, information, or things relating to the subject matter of the Request. Common Cause Florida will make a reasonable effort to produce responsive, discoverable documents or things that are within their possession, custody, or control sufficient to respond to the Requests.

10. Common Cause Florida objects to the Requests to the extent they are not limited in time or scope.

11. Common Cause Florida objects to the Requests to the extent they seek information that pertains to periods of time that are not at issue in this litigation.

12. Common Cause Florida objects to the Requests to the extent they are duplicative of other document requests, interrogatories, and/or other discovery requests.

13. Common Cause Florida objects to the Requests to the extent they concern questions of law or call for legal conclusions.

14. Common Cause Florida reserves the right to assert additional objections to

the Requests as appropriate and to amend or supplement these objections and responses in accordance with the applicable rules and court orders. Common Cause Florida also reserves the right to object to the use of any of its responses at trial or other hearing or proceeding, as Common Cause Florida deem necessary and appropriate. To the extent that Common Cause Florida may provide information or documents in response to any Request herein, the Organizational Plaintiffs do so without limiting or waiving any of the substantive objections that they may otherwise have available.

15. Any response(s) or act(s) of production by Common Cause Florida shall in no way constitute or be construed as a waiver of any of the objections contained herein.

16. To the extent that Common Cause Florida agrees in these responses to produce certain documents, information, or things, these responses shall not be construed as conceding that the documents, information, or things exist and/or are in the possession, custody, or control of Common Cause Florida. Instead, it means that Common Cause Florida will perform a reasonable search for and produce such documents, information, or things to the extent any responsive documents, information, or things exist and are not otherwise protected from disclosure.

17. Inadvertent production of privileged information, documents, materials, or things shall not constitute a waiver of any applicable privilege or doctrine, including but not limited to, objections on the basis of competency, confidentiality, relevancy, materiality, work-product, privilege, and/or admissibility as evidence, as such objections may apply at trial or otherwise in this action.

18. Common Cause Florida objects to the definitions of “communication,” “document,” and “communications” to the extent they impose a burden greater than that imposed

by the Federal Rules of Civil Procedure.

19. Common Cause Florida objects to Instructions 3 and 4 to the extent they impose a requirement to describe a document being withheld or deemed unavailable in greater specificity than required by law. These Instructions seek to require Common Cause Florida to incur substantial expense far outweighing any conceivable benefit to the Defendant (which will be negligible), and seek to impose burdens beyond those imposed by the Federal Rules of Civil Procedure and applicable case law.

### **SPECIFIC RESPONSES AND OBJECTIONS**

#### **REQUEST NO. 1**

Any and all documents identified in your answers to the Defendant's First Interrogatories to Common Cause Florida.

#### **RESPONSE TO REQUEST NO. 1**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents, where a subset of such documents would be sufficient. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents

exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 2**

Any and all documents used by you or your counsel in preparation of your answers to the Defendant's First Interrogatories to Common Cause Florida.

**RESPONSE TO REQUEST NO. 2**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents, where a subset of such documents would be sufficient. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 3**

Any and all documents that evidence, relate to, or refer to your claims and allegations in the Second Amended Complaint.

**RESPONSE TO REQUEST NO. 3**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly

burdensome, and not proportional to the needs of the case as it requests “all” documents, where a subset of such documents would be sufficient. Common Cause Florida further objects to this Request as unduly broad, burdensome, and not proportional to the needs of the case as it requests all documents that “evidence, relate to, or refer to” their claims. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida’s possession, custody, or control, and are identified after a reasonable search.

#### **REQUEST NO. 4**

Any and all documents, correspondence, memoranda, e-mails, or other writings you have consulted or upon which you have relied in the preparation of the Second Amended Complaint.

#### **RESPONSE TO REQUEST NO. 4**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents, where a subset of such documents would be sufficient. Common Cause Florida further objects to this Request as unduly broad, burdensome, and not proportional to the needs of the case as it requests all documents that “you have consulted” “in the preparation of the Second Amended Complaint. Common Cause Florida further objects to this Request as seeking disclosure of information



protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

#### **REQUEST NO. 5**

Any and all written or otherwise recorded or documented statements concerning this action or the subject of this action made by any party to this action or third party with firsthand knowledge of any facts concerning the subject matter of this action.

#### **RESPONSE TO REQUEST NO. 5**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documented statements. Common Cause Florida further objects to this Request as seeking irrelevant information. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents

exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 6**

Any and all expert reports received by you, your agents, or your counsel in connection with this litigation, and copies of all documents and materials provided to any expert retained by you, your agents, or your counsel in connection with this litigation.

**RESPONSE TO REQUEST NO. 6**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida. Common Cause Florida further objects to this Request to the extent it seeks disclosure of experts and/or expert testimony. Common Cause Florida will disclose the identity of expert witnesses and the scope of expert testimony consistent with the applicable rules.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search. Common Cause Florida will not be producing draft experts reports.

**REQUEST NO. 7**

Any and all documents that evidence, relate to, or refer to your allegations in Count I of the Second Amended Complaint.

**RESPONSE TO REQUEST NO. 7**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents. Common Cause Florida further objects to this Request as overly broad as it seeks documents that “evidence, relate to, or refer to” factual statements. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida. Common Cause Florida further objects to this Request to the extent it seeks disclosure of experts and/or expert testimony. Common Cause Florida will disclose the identity of expert witnesses and the scope of expert testimony consistent with the applicable rules.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida’s possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 8**

Any and all documents that evidence, relate to, or refer to your allegations in Count II of the Second Amended Complaint.

**RESPONSE TO REQUEST NO. 8**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents. Common Cause Florida further objects to this Request as overly broad as it seeks documents that “evidence, relate to, or refer to” factual statements. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida. Common Cause Florida further objects to this Request to the extent it seeks disclosure of experts and/or expert testimony. Common Cause Florida will disclose the identity of expert witnesses and the scope of expert testimony consistent with the applicable rules.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida’s possession, custody, or control, and are identified after a reasonable search.

#### **REQUEST NO. 9**

Any and all documents that evidence, relate to, or refer to your annual expenditures during the last five years on get-out-the-vote activities.

#### **RESPONSE TO REQUEST NO. 9**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly

burdensome, and not proportional to the needs of the case as it requests “all” documents.

Common Cause Florida further objects to this Request as unduly burdensome as it seeks information irrelevant to the issues underlying the litigation and an overbroad scope of time.

Common Cause Florida further objects to this Request as overly broad as it seeks documents that “evidence, relate to, or refer to” activities, and would include irrelevant material such as, for example, calendar invitations. Common Cause Florida further objects to this Request as overly vague because the phrase “get-out-the-vote-activities” is undefined and open to interpretation.

Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida’s possession, custody, or control, and are identified after a reasonable search.

#### **REQUEST NO. 10**

Any and all documents that evidence, relate to, or refer to your annual expenditures during the last five years on educating voters on how to vote.

#### **RESPONSE TO REQUEST NO. 10**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents.

Common Cause Florida further objects to this Request as unduly burdensome as it seeks information irrelevant to the issues underlying the litigation and an overbroad scope of time.

Common Cause Florida further objects to this Request as overly broad as it seeks documents that “evidence, relate to, or refer to” activities, and would include irrelevant material such as, for

example, calendar invitations. Common Cause Florida further objects to this Request as overly vague because the phrase “educating voters on how to vote” is undefined and open to interpretation. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida’s possession, custody, or control, and are identified after a reasonable search.

#### **REQUEST NO. 11**

Any and all documents that evidence, relate to, or refer to your annual expenditures during the last five years on advocating for policies to expand voting rights and/or access to the political process.

#### **RESPONSE TO REQUEST NO. 11**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents. Common Cause Florida further objects to this Request as unduly burdensome as it seeks information irrelevant to the issues underlying the litigation and an overbroad scope of time. Common Cause Florida further objects to this Request as overly broad as it seeks documents that “evidence, relate to, or refer to” activities, and would include irrelevant material such as, for example, calendar invitations. Common Cause Florida further objects to this Request as overly vague because the phrase “advocating for policies to expand voting rights and/or access to the political process” is undefined and open to interpretation. Common Cause Florida will respond

to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 12**

Any and all documents that evidence, relate to, or refer to your annual expenditures during the last five years on voter registration.

**RESPONSE TO REQUEST NO. 12**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as unduly burdensome as it seeks information irrelevant to the issues underlying the litigation and an overbroad scope of time. Common Cause Florida further objects to this Request as overly broad as it seeks documents that "evidence, relate to, or refer to" activities, and would include irrelevant material such as, for example, calendar invitations. Common Cause Florida further objects to this Request as overly vague because the phrase "annual expenditures" "on voter registration" is undefined and open to interpretation. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents

exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 13**

Any and all documents that evidence, relate to, or refer to your annual expenditures during the last five years on any role you have played with regard to Florida's redistricting efforts.

**RESPONSE TO REQUEST NO. 13**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as unduly burdensome as it seeks information irrelevant to the issues underlying the litigation and an overbroad scope of time. Common Cause Florida further objects to this Request as overly broad as it seeks documents that "evidence, relate to, or refer to" activities, and would include irrelevant material such as, for example, calendar invitations. Common Cause Florida further objects to this Request as overly vague because the phrase "any role you have played with regard to Florida's redistricting efforts" is undefined and open to interpretation. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 14**

Any and all documents that evidence, relate to, or refer to your annual expenditures during the last five years on election protection efforts.



**RESPONSE TO REQUEST NO. 14**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents. Common Cause Florida further objects to this Request as unduly burdensome as it seeks information irrelevant to the issues underlying the litigation and an overbroad scope of time. Common Cause Florida further objects to this Request as overly broad as it seeks documents that “evidence, relate to, or refer to” activities, and would include irrelevant material such as, for example, calendar invitations. Common Cause Florida further objects to this Request as overly vague because the phrase “election protection efforts” is undefined and open to interpretation. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida’s possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 15**

Any and all documents that evidence, relate to, or refer to your annual expenditures during the last five years on any of your activities or items (excluding those listed in Request Nos. 9 through 14) that you will discuss as part of this lawsuit.

**RESPONSE TO REQUEST NO. 15**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents.

Common Cause Florida further objects to this Request as unduly burdensome as it seeks information irrelevant to the issues underlying the litigation and an overbroad scope of time.

Common Cause Florida further objects to this Request as overly broad as it seeks documents that “evidence, relate to, or refer to” activities, and would include irrelevant material such as, for example, calendar invitations. Common Cause Florida further objects to this Request as overly vague because the phrase “discuss as part of this lawsuit” is undefined and open to interpretation. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida’s possession, custody, or control, and are identified after a reasonable search.

#### **REQUEST NO. 16**

Any and all documents that evidence, relate to, or refer to the type and/or specific amount of any resources that you will need to divert as a result of SB 2-C.

#### **RESPONSE TO REQUEST NO. 16**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents. Common Cause Florida further objects to this Request as overly broad as it seeks documents that “evidence, relate to, or refer to” activities, and would include irrelevant material such as, for example, calendar invitations. Common Cause Florida further objects to this Request as overly vague because the phrase “divert as a result of SB 2-C” is undefined and open to interpretation. Common Cause Florida further objects to this Interrogatory as unduly burdensome because it

seeks information irrelevant to the underlying litigation, is unlimited in scope of time, and that Common Cause Florida need not identify “specific” resources that will be diverted. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida’s possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 17**

Any and all documents that evidence, relate to, or refer to your specific activities and/or items that will lose resources as a result of SB 2-C.

**RESPONSE TO REQUEST NO. 17**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents. Common Cause Florida further objects to this Request as overly broad as it seeks documents that “evidence, relate to, or refer to” activities, and would include irrelevant material such as, for example, calendar invitations. Common Cause Florida further objects to this Request as overly vague because the phrase “lose resources as a result of SB 2-C” is undefined and open to interpretation. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida. Common Cause Florida further objects to this Interrogatory as unduly burdensome because it seeks information irrelevant to the underlying litigation, unlimited in scope of time, and that Common Cause Florida need not identify “specific” activities that will “lose resources.”

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 18**

Any and all documents that evidence, relate to, or refer to your allegation in paragraph 79 of the Second Amended Complaint that "Governor DeSantis acted with invidious intent to disadvantage Black Floridians."

**RESPONSE TO REQUEST NO. 18**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as overly broad as it seeks documents that "evidence, relate to, or refer to" factual statements. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida. Common Cause Florida further objects to this Interrogatory to the extent it seeks disclosure of experts and/or expert testimony. Common Cause Florida will disclose the identity of expert witnesses and the scope of expert testimony consistent with the applicable rules.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 19**

Any and all documents that evidence, relate to, or refer to your allegation in paragraph 87 of the Second Amended Complaint that Black voters in North Florida can no longer "elect a candidate of their choice."

**RESPONSE TO REQUEST NO. 19**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as overly broad as it seeks documents that "evidence, relate to, or refer to" factual statements. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida. Common Cause Florida further objects to this Interrogatory to the extent it seeks disclosure of experts and/or expert testimony. Common Cause Florida will disclose the identity of expert witnesses and the scope of expert testimony consistent with the applicable rules.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 20**

Any and all documents that evidence, relate to, or refer to your allegation in paragraph 96 of the Second Amended Complaint that SB 2-C "intentionally "cracks" and "packs" Black populations across the state."

**RESPONSE TO REQUEST NO. 20**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as overly broad as it seeks documents that "evidence, relate to, or refer to" factual statements. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking a legal conclusion. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida. Common Cause Florida further objects to this Interrogatory to the extent it seeks disclosure of experts and/or expert testimony. Common Cause Florida will disclose the identity of expert witnesses and the scope of expert testimony consistent with the applicable rules.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 21**

Any and all documents that evidence, relate to, or refer to your allegation in paragraph 97 of the Second Amended Complaint that "[t]he Black Population in the western half of St. Petersburg now has no chance of electing their candidate of choice or even exerting meaningful influence over the election process."

**RESPONSE TO REQUEST NO. 21**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as overly broad as it seeks documents that "evidence, relate to, or refer to" factual statements. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida. Common Cause Florida further objects to this Interrogatory to the extent it seeks disclosure of experts and/or expert testimony. Common Cause Florida will disclose the identity of expert witnesses and the scope of expert testimony consistent with the applicable rules.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 22**

Any and all documents that evidence, relate to, or refer to your allegation in paragraph 112 of the Second Amended Complaint that "[t]he Enacted Plan bears most heavily on Black Floridians."

**RESPONSE TO REQUEST NO. 22**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as overly broad as it seeks documents that "evidence, relate to, or refer to" factual statements. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida. Common Cause Florida further objects to this Interrogatory to the extent it seeks disclosure of experts and/or expert testimony. Common Cause Florida will disclose the identity of expert witnesses and the scope of expert testimony consistent with the applicable rules.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents



exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 23**

Any and all documents that evidence, relate to, or refer to your allegation in paragraph 115 of the Second Amended Complaint that "Florida law required the preservation of a Black opportunity district in Northern Florida."

**RESPONSE TO REQUEST NO. 23**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as overly broad as it seeks documents that "evidence, relate to, or refer to" factual statements. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking a legal conclusion. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida. Common Cause Florida further objects to this Interrogatory to the extent it seeks disclosure of experts and/or expert testimony. Common Cause Florida will disclose the identity of expert witnesses and the scope of expert testimony consistent with the applicable rules.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents

exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 24**

Any and all documents and/or communications between you and all current and former employees, agents, elected officials, and officers of the Florida Senate regarding the subject matter of this litigation.

**RESPONSE TO REQUEST NO. 24**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 25**

Any and all documents and/or communications between you and all current and former employees, agents, elected officials, and officers of the Florida House of Representatives regarding the subject matter of this litigation.

**RESPONSE TO REQUEST NO. 25**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida’s possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 26**

Any and all documents and/or communications between you and all current and former employees, agents, elected officials, and officers of the Executive Office of the Governor of Florida regarding the subject matter of this litigation.

**RESPONSE TO REQUEST NO. 26**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents. Common Cause Florida further objects to this Request as it seeks documents that are publicly

available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 27**

Any and all documents and/or communications between you and all current and former employees, agents, elected officials, and officers of a Florida Supervisor of Elections Office regarding the subject matter of this litigation.

**RESPONSE TO REQUEST NO. 27**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will

respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 28**

Any and all documents relating to any media training or educational sessions that you organized, sponsored, or attended involving at least one elected official or staff member of the Florida Senate or Florida House of Representatives.

**RESPONSE TO REQUEST NO. 28**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking information irrelevant to the underlying litigation. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will produce documents responsive to this Request, to the extent such documents

exist, are not privileged, are within Common Cause Florida's possession, custody, or control, and are identified after a reasonable search.

**REQUEST NO. 29**

Any and all documents relating to any meeting you organized, sponsored, or attended where polling data relating to redistricting was shared.

**RESPONSE TO REQUEST NO. 29**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests "all" documents. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as seeking information irrelevant to the underlying litigation. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will not be producing documents in response to this Request.

**REQUEST NO. 30**

Any and all documents that evidence, relate to, or refer to your fundraising or other efforts to obtain contributions to pay for this litigation.

**RESPONSE TO REQUEST NO. 30**

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case as it requests “all” documents. Common Cause Florida further objects to this Request as it seeks documents that are publicly available or obtainable from others. Common Cause Florida further objects to this Request as overly broad in scope of time. Common Cause Florida further objects to this Request as overly broad as it seeks documents that “evidence, relate to, or refer to” activities, and would include irrelevant material such as, for example, calendar invitations. Common Cause Florida further objects to this Request as seeking information irrelevant to the underlying litigation. Common Cause Florida further objects to this Request as seeking disclosure of information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protective doctrine. Common Cause Florida will respond to this Request only as to documents within the possession, custody, or control of Common Cause Florida.

Subject to and without waiving the foregoing general and specific objections, Common Cause Florida will not be producing documents in response to this Request.

Dated: March 20, 2023

By: /s/ Alvin Li  
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