

**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 SET OF INTERROGATORIES TO ORGANIZATIONAL
PLAINTIFFS**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Common Cause Florida hereby objects and responds to the first set of interrogatories to the Organizational Plaintiffs (the "Interrogatories") 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 Interrogatory, and are incorporated by reference in each and every response below as if set forth fully therein. Failure to reiterate a General Objections below does not constitute a waiver of that or any other objections.

1. Common Cause Florida generally objects to the Interrogatories, 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, 33, and 34 and any other applicable rule or law. Common Cause Florida will respond in accordance with their obligations under the applicable rules.

2. Common Cause Florida generally objects to the Interrogatories to the extent that they seek information that is not relevant to any party's claim or defense. To the extent the Interrogatories seek information not relevant to any party's claim or defense, Common Cause Florida further objects to the Interrogatories as unduly burdensome and/or oppressive.

3. Common Cause Florida objects to the Interrogatories 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 has 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. The responses to the Interrogatories are given without prejudice to Common Cause Florida's right to use facts, witnesses or documents discovered after service of

these responses or omitted from these responses by oversight, inadvertence, or other good faith error or mistake. The information furnished by Common Cause Florida may include hearsay and other forms of evidence which are neither reliable nor admissible.

5. Common Cause Florida objects to the Interrogatories to the extent that they seek information from beyond the time period relevant to this action on the grounds that such information is not relevant to any party's claim or defense.

6. 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.

7. Common Cause Florida objects to the Interrogatories to the extent they seek information not contained in documents that currently exist and require Common Cause Florida to create, compile, or develop new documents or databases.

8. Common Cause Florida objects to the Interrogatories 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.

9. Common Cause Florida objects to the Interrogatories to the extent they

seek information that is not in the possession, custody, or control of Common Cause Florida.

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

11. Common Cause Florida objects to the Interrogatories as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent that they call for the identification of “each,” “any,” or “all” when relevant information can be obtained from fewer than “each,” “any,” or “all.”

12. Common Cause Florida objects to any implications and to any explicit or implicit characterization of facts, events, circumstances, or issues in the Interrogatories. Common Cause Florida’s responses to the Interrogatories shall not be construed as admissions to any legal conclusion or that any explicit or implicit characterizations of the facts, events, circumstances, or issues contained in the Interrogatories are relevant to this action.

13. Common Cause Florida objects to the Interrogatories to the extent they concern questions of law or call for legal conclusions. By making these responses, Common Cause Florida do not concede that the Interrogatories or the responses solely concern questions of fact, as opposed to mixed questions of fact and law or questions of law.

14. Common Cause Florida objects to the Interrogatories to the extent that they seek production of information that cannot be located as a result of a reasonable search of reasonably available sources. Each Interrogatory will be considered separately in making a

determination about where reasonably to look for responsive information.

15. Common Cause Florida reserves the right to assert additional objections to the Interrogatories 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 objects to the use of any of its responses at trial or other hearing or proceeding, as he Organizational Plaintiffs deem necessary and appropriate. To the extent that Common Cause Florida may provide information or documents in response to any Interrogatory herein, Common Cause Florida do so without limiting or waiving any of the substantive objections that it may otherwise have available.

16. Common Cause Florida objects to these Interrogatories to the extent they seek information protected from disclosure under the First Amendment because such disclosure would intrude on or chill Common Cause Florida's First Amendment rights, including the right to associate and to engage in the exchange of ideas, and no compelling need for the information exists. *See, e.g., NAACP v. Alabama*, 357 U.S. 449, 460 (1958); *Whole Woman's Health v. Smith*, 896 F.3d 362 (5th Cir. 2018), as revised (July 17, 2018); *Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010).

17. Common Cause Florida objects to the definitions of "Plaintiff," "you," and "your" as referring to any entities other than Common Cause Florida. Common Cause Florida objects to Instruction 2 for seeking information outside Common Cause Florida's possession, custody, or control. Common Cause Florida will respond to the Interrogatories only as to information within the possession, custody, or control of Common Cause Florida.

18. Common Cause Florida objects to Instructions 5, 6, and 7 to the extent they impose a requirement to describe objections to responses 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

INTERROGATORY NO. 1

Please provide the name, address, telephone number, place of employment, job title, and relationship to the Organizational Plaintiff for any person answering or assisting in answering these interrogatories, and identify the specific interrogatories each person responded to or assisted in the preparation of

RESPONSE TO INTERROGATORY NO. 1

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Subject to the General Objections, Common Cause Florida responds that, in addition to counsel to Plaintiffs, the following individuals assisted in responding to each interrogatory:

- Kathay Feng
 - 430 S. Garfield Ave. Suite 418, Alhambra, CA 91801 (LA Office address)
 - 310-880-6668
 - Place of employment: Common Cause
 - Title: Vice President of Programs
- Alton Wang
 - 430 S. Garfield Ave. Suite 418, Alhambra, CA 91801 (LA Office address)
 - 626-623-3725
 - Place of employment: Common Cause
 - Title: Equal Justice Works Fellow

INTERROGATORY NO. 2

Please identify any person who has, claims to have, or who you believe may have knowledge or information pertaining to any fact alleged in your Second Amended Complaint or any fact

underlying the subject matter of this action, and state the specific nature and substance of the knowledge you believe each person identified may have.

RESPONSE TO INTERROGATORY NO. 2

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as premature; discovery is in its initial stages, and Common Cause Florida has not yet had the opportunity to fully review all relevant documents or depose any relevant witnesses. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as overly broad, unduly burdensome, lacking an express temporal limitation, and not proportional to the needs of the case as it as it requests the Organization Plaintiffs to identify any person who has “knowledge or information pertaining to any fact” underlying this litigation. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. 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 the foregoing General and Specific Objections, Common Cause Florida responds that the following may have relevant information:

Name	Title	Contact Information	Subjects of Relevant Information
All Individual Plaintiffs		c/o Patterson Belknap Webb & Tyler LLP	Individual Plaintiffs have knowledge of their residency and

		1133 Avenue of the Americas, New York, NY 10036 (212) 336-2000	voter registration at the time relevant to the complaint.
All Organizational Plaintiffs		c/o Patterson Belknap Webb & Tyler LLP 1133 Avenue of the Americas, New York, NY 10036 (212) 336-2000	Organizational Plaintiffs have knowledge of the effects of SB 2-C on the state of Florida
Adam Foltz		c/o Holtzman Vogel Baran Torchinsky & Josefiak PLLC 119 S. Monroe Street, Suite 500, Tallahassee, FL 32301 850-270-5938	Mr. Foltz was engaged by the office of Governor DeSantis to draw Congressional maps.
J. Alex Kelly	Deputy Chief of Staff, Office of the Governor	c/o Holtzman Vogel Baran Torchinsky & Josefiak PLLC 119 S. Monroe Street, Suite 500, Tallahassee, FL 32301 850-270-5938	Mr. Kelly was involved in drawing the Congressional map endorsed by Governor DeSantis. Mr. Kelly also testified before the Senate Redistricting Committee.
Ray Rodrigues	Former Chair, Senate Reapportionment Committee	c/o Shutts & Bowen LLP 215 South Monroe Street, Suite 804,	Chancellor Rodrigues was chair of the Reapportionment Committee.

		Tallahassee, FL 32301	
Governor Ron DeSantis	Governor of Florida	c/o Holtzman Vogel Baran Torchinsky & Josefiak PLLC 119 S. Monroe Street, Suite 500, Tallahassee, FL 32301 850-270-5938	Governor DeSantis was the chief executive of the State of Florida during the reapportionment process.
Kaylee Tuck	Representative, Florida House of Representatives	c/o GrayRobinson, P.A. 301 South Bronough Street, Suite 600, Tallahassee, FL 32301 850-577-9090	Representative Tuck was a member of the Redistricting Committee.
Randy Fine	Representative, Florida House of Representatives	c/o GrayRobinson, P.A. 301 South Bronough Street, Suite 600, Tallahassee, FL 32301 850-577-9090	Representative Fine was vice-chair of the Redistricting Committee.
Tom Leek	Representative, Florida House of Representatives	c/o GrayRobinson, P.A. 301 South Bronough Street, Suite 600, Tallahassee, FL 32301 850-577-9090	Representative Leek was chair of the Redistricting Committee.

Tyler Sirois	Representative, Florida House of Representatives	c/o GrayRobinson, P.A. 301 South Bronough Street, Suite 600, Tallahassee, FL 32301 850-577-9090	Representative Sirois was a member of the Redistricting Committee.
Robert Popper	Senior Attorney, Judicial Watch	c/o Driscoll & Seltzer, PLLC 2000 Duke Street, Suite 300, Alexandria, VA 22314 703-879-2601	Mr. Popper testified before the House Redistricting Committee in connection with a map proposed by the Governor's office.
Ryan Newman	General Counsel, Office of the Governor	c/o Holtzman Vogel Baran Torchinsky & Josefiak PLLC 119 S. Monroe Street, Suite 500, Tallahassee, FL 32301 850-270-5938	Mr. Newman authored a memorandum in connection with the Governor's veto of Congressional maps passed by both chambers of the Florida Legislature.
Jennifer Bradley	Senator, Florida Senate	c/o General Counsel for the Florida State Senate 302 The Capitol, 404 South Monroe Street, Tallahassee, FL 32399	Senator Bradley was chair of the Select Subcommittee on Congressional Reapportionment.
Wilton Simpson	Former President, Florida Senate	c/o Shutts & Bowen LLP	Mr. Simpson was President of the Senate.

		215 South Monroe Street, Suite 804, Tallahassee, FL 32301 850-241-1725	
Chris Sprowls	Former Speaker, Florida House of Representatives	c/o GrayRobinson, P.A. 301 South Bronough Street, Suite 600, Tallahassee, FL 32301 850-577-9090	Mr. Sprowls was Speaker of the House.
Valdez V. Demings	Former United States Representative	Unknown at this time.	Former Representative Demings previously represented CD-10.
Maxwell Alejandro Frost	United States Representative	Unknown at this time.	Representative Frost represents CD-10.
Alfred J. Lawson, Jr.	Former United States Representative	Unknown at this time.	Former Representative Lawson previously represented in CD-5.
John H. Rutherford	United States Representative	Unknown at this time.	Representative Rutherford previously represented CD-4 and currently represents CD-5.
Kathy Castor	United States Representative	Unknown at this time.	Representative Castor is the incumbent representative in CD-14.

Anna Paulina Luna	United States Representative	Unknown at this time.	Representative Luna represents CD-13.
Charlie Crist	Former United States Representative	Unknown at this time.	Governor Crist was previously the representative in CD-13.
John Gore	Jones Day	Unknown at this time.	Mr. Gore was approached by the Governor's office to assist in the redistricting process.
Hans A. von Spakovsky	Heritage Foundation	Unknown at this time.	Mr. von Spakovsky was approached by the Governor's office to assist in the redistricting process.
Scott Kellar	Unknown at this time.	Unknown at this time.	Mr. Kellar was approached by the Governor's office to assist in the redistricting process.
Michael Barley	Unknown at this time.	Unknown at this time.	Mr. Barley was approached by the Governor's office to assist in the redistricting process.
Ben Albritton	Senator, Florida Senate	c/o Office of the Senate General Counsel 302 The Capitol, 404 South Monroe Street, Tallahassee, FL 32399	Current senator for FL Senate District 27, successor to former Senator Rodrigues; his office may have records retained from Senator Rodrigues.
Karen Gonzalez Pittman	Representative, Florida House of Representatives	c/o GrayRobinson, P.A.	Current representative for FL House District 65,

		301 South Bronough Street, Suite 600, Tallahassee, FL 32301 850-577-9090	successor to former Representative Sprowls; her office may have records retained from Representative Sprowls.
Anna Eskamani	Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Made public statements regarding the redistricting process.
Christine Hunschofsky	Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Representative Hunschofsky was a member of the Congressional Redistricting Subcommittee.
Dan Daley	Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Representative Daley was the ranking member of the State Legislative Redistricting Subcommittee.
Daryl Campbell	Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Made public statements regarding the redistricting process.

Dotie Joseph	Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Representative Joseph was a member of the Congressional Redistricting Subcommittee.
Fentrice Driskell	Minority Leader, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Leader Driskeel was a member of the Congressional Redistricting Subcommittee.
Kelly Skidmore	Representative, Florida House of Representatives	Unknown at this time.	Representative Skidmore was the Ranking Member of the Congressional Redistricting Subcommittee.
Michael Gottlieb	Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Made public statements regarding the redistricting process.
Susan Valdes	Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Representative Valdes was a member of the State Legislative Redistricting Subcommittee.

Yvonne Hayes Hinson	Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Made public statements regarding the redistricting process.
Randolph Bracy	Senator, Florida Senate	c/o Office of the Senate General Counsel 302 The Capitol, 404 South Monroe Street, Tallahassee, FL 32399 305-858-2900	Senator Bracy was a member of the Committee on Reapportionment.
Tracie Davis	Senator, Florida Senate	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Made public statements regarding the redistricting process.
Joseph Geller	Former Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Mr. Geller was the Ranking Member on the Redistricting Committee.
Evan Jenne	Former Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133	Mr. Jenne was a member of the Redistricting Committee.

		305-858-2900	
Daisy Morales	Former Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Ms. Morales was a member of the Congressional Redistricting Subcommittee.
Anika Tene Omphroy	Former Representative, Florida House of Representatives	c/o Coffey Burlington 2601 South Bayshore Drive, Penthouse One, Miami, FL 33133 305-858-2900	Ms. Omphroy was a member of the Redistricting Committee.

INTERROGATORY NO. 3

Other than the persons or entities identified above, identify any person or entity known to you who has possession or control of any documents pertaining to any facts or issues involved in this action, and with regard to each person, please indicate the type and nature of each such document or item.

RESPONSE TO INTERROGATORY NO. 3

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as premature; discovery is in its initial stages, and Common Cause Florida has not yet had the opportunity to fully review all relevant documents or depose any relevant witnesses. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as overly broad, unduly burdensome, lacking an express temporal limitation, and not proportional to the needs of the case

as it as it requests the Organization Plaintiffs to identify any person who has “pertaining to any facts or issues” underlying this litigation and to “indicate the type and nature of each such document or item.” Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others.

Subject to the foregoing General and Specific Objections, Common Cause Florida responds that Common Cause Florida is unaware of any individuals apart from those identified in response to Interrogatory No. 2, excluding counsel.

INTERROGATORY NO. 4

Please identify the date you were founded and any and all principal and regional offices you may have, including when those offices were established

RESPONSE TO INTERROGATORY NO. 4

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as overly broad and unduly burdensome because the description of “principal and regional” offices is undefined and not reflective of how Common Cause Florida is organized. Moreover, only certain offices are party to this case and the dates that other offices were founded is irrelevant to this action.

Subject to the foregoing General and Specific Objections, Common Cause Florida responds that the national organization was founded in 1970, and is headquartered at 805 15th Street, NW, Suite 800 Washington, DC 20005. Common Cause Florida is located at 333 3rd Ave N, Unit 214, St Petersburg, FL 33701.

INTERROGATORY NO. 5

Please identify whether you have any members, and if so, please list the approximate number of members you have, the congressional districts in which your members are located, any members who are parties or witnesses in this case, the dates on which those individuals first became members, and the specific injuries that your members are alleged to have suffered or will suffer in the future related to the claims in this litigation.

RESPONSE TO INTERROGATORY NO. 5

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of the case as it seeks information concerning all members, even members who are not party to this action. Common Cause Florida further objects to this Interrogatory as premature; discovery is in its initial stages, and Common Cause Florida has not yet had the opportunity to fully review all relevant documents or depose any relevant witnesses. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory to the extent it calls for a legal conclusion. 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. Common Cause Florida further objects to this Interrogatory as unduly burdensome because it seeks information irrelevant to the underlying litigation.

To the extent this Interrogatory requests information for the purposes of establishing standing, this interrogatory is not proportional to that objective for several reasons. In multi-plaintiff cases, if there is one plaintiff “who has demonstrated standing to assert these rights as

his own,” it is unnecessary to “consider whether the other individual and corporate plaintiffs have standing to maintain the suit.” *Vill. of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 264 & n.9. Furthermore, to satisfy associational standing, organizations need only show that at least one member of the association has standing to sue in his or her own right. *See Doe v. Stincer*, 175 F.3d 879, 884 (11th Cir. 1999)

Subject to the foregoing General and Specific Objections, Common Cause Florida responds that it has approximately 93,700 members and supporters in Florida and approximately 1.5 million members nationwide and that its members have undergone and will undergo a variety of harms and injuries, including the unconstitutional disadvantaging of the voting power of Black Floridians as a result of the claims in this litigation.

INTERROGATORY NO. 6

Please identify the type and/or specific amount of any and all resources that you will need to divert as a result of SB 2-C and identify the specific activities and/or items that any such resources will be diverted from.

RESPONSE TO INTERROGATORY NO. 6

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory to the extent it calls for a legal conclusion. Common Cause Florida further objects to this Interrogatory as unduly burdensome because it seeks information irrelevant to the underlying litigation and that Common Cause Florida need not identify “specific” resources that will be diverted. Common Cause Florida further objects to this interrogatory to the extent it seeks information shielded from discovery by the attorney-client privilege, or communications protected under the work-product doctrine or the common-interest privilege.

Subject to the foregoing General and Specific Objections, Common Cause Florida responds that Common Cause Florida must divert resources including time and money on a variety of activities related to SB 2-C. But for SB 2-C, Common Cause Florida would use its funds to continue its broader voter education and voter-protection work that is not specific to SB 2-C's unlawful infirmities. One of Common Cause Florida's primary purposes is to promote and defend voters' rights to fair and legal congressional maps, and the right of every eligible voter to participate in the democratic process, and the Defendant's promulgation of an illegal map via SB 2-C frustrates that purpose and impairs Common Cause Florida's ability to fulfil its goals.

INTERROGATORY NO. 7

For every activity or item identified in response to Interrogatory No. 6, please identify your annual expenditures during each of the last five years on those activities or items.

RESPONSE TO INTERROGATORY NO. 7

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory to the extent it calls for a legal conclusion. Common Cause Florida further objects to this Interrogatory as unduly burdensome because it seeks information irrelevant to the underlying litigation and its scope in time is unduly broad and not proportional to the needs of this matter as SB 2-C was enacted during the Special Legislative session in April 2022.

Subject to the foregoing General and Specific Objections, Common Cause Florida will not be responding to this Interrogatory.

INTERROGATORY NO. 8

Please identify the specific activities and/or items that will receive the diverted funds that you have identified in response to Interrogatory No. 6, and the type and/or specific amount that each activity or item will receive.

RESPONSE TO INTERROGATORY NO. 8

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory to the extent it calls for a legal conclusion. Common Cause Florida further objects to this Interrogatory as unduly burdensome because it seeks information irrelevant to the underlying litigation and that Common Cause Florida need not identify “specific” resources that will be diverted.

Subject to the foregoing General and Specific Objections, Common Cause Florida responds that Common Cause Florida must divert resources including time and money on a variety of activities related to SB 2-C. But for SB 2-C, Common Cause Florida would use its funds to continue its broader voter education and voter-protection work that is not specific to SB 2-C’s unlawful infirmities. One of Common Cause Florida’s primary purposes is to promote and defend voters’ rights to fair and legal congressional maps, and the right of every eligible voter to participate in the democratic process, and the Defendant’s promulgation of an illegal map via SB 2-C frustrates that purpose and impairs Common Cause Florida’s ability to fulfil its goals.

INTERROGATORY NO. 9

Please identify all documents and evidence that relate to your allegation in paragraph 79 of the Second Amended Complaint that “Governor DeSantis acted with invidious intent to disadvantage Black Floridians.”

RESPONSE TO INTERROGATORY NO. 9

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as premature; discovery is in its initial stages, and Common Cause Florida have not yet had the opportunity to fully review all relevant documents or depose any relevant witnesses. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. 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. Common Cause Florida further objects to this Interrogatory as seeking the production of documents.

Subject to the foregoing General and Specific Objections, Common Cause Florida refers the Defendant to their responses and objections to Defendant's First Request for Production to Common Cause Florida.

INTERROGATORY NO. 10

Please identify all documents and evidence relating 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 INTERROGATORY NO. 10

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as premature; discovery is in

its initial stages, and Common Cause Florida have not yet had the opportunity to fully review all relevant documents or depose any relevant witnesses. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. 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. Common Cause Florida further objects to this Interrogatory as seeking the production of documents.

Subject to the foregoing General and Specific Objections, Common Cause Florida refers the Defendant to their responses and objections to Defendant's First Request for Production to Common Cause Florida.

INTERROGATORY NO. 11

Please identify all documents and evidence relating 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 INTERROGATORY NO. 11

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as premature; discovery is in its initial stages, and Common Cause Florida have not yet had the opportunity to fully review all relevant documents or depose any relevant witnesses. Common Cause Florida will not be in a

position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. 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. Common Cause Florida further objects to this Interrogatory as seeking the production of documents.

Subject to the foregoing General and Specific Objections, Common Cause Florida refers the Defendant to their responses and objections to Defendant's First Request for Production to Common Cause Florida.

INTERROGATORY NO. 12

Please identify all documents and evidence relating 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 INTERROGATORY NO. 12

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as premature; discovery is in its initial stages, and Common Cause Florida have not yet had the opportunity to fully review all relevant documents or depose any relevant witnesses. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is

complete. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. 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. Common Cause Florida further objects to this Interrogatory as seeking the production of documents.

Subject to the foregoing General and Specific Objections, Common Cause Florida refers the Defendant to their responses and objections to Defendant's First Request for Production to Common Cause Florida.

INTERROGATORY NO. 13

Please identify all documents and evidence relating to your allegation in paragraph 112 of the Second Amended Complaint that "[t]he Enacted Plan bears most heavily on Black Floridians."

RESPONSE TO INTERROGATORY NO. 13

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as premature; discovery is in its initial stages, and Common Cause Florida have not yet had the opportunity to fully review all relevant documents or depose any relevant witnesses. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained

from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. 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. Common Cause Florida further objects to this Interrogatory as seeking the production of documents.

Subject to the foregoing General and Specific Objections, Common Cause Florida refers the Defendant to their responses and objections to Defendant's First Request for Production to Common Cause Florida.

INTERROGATORY NO. 14

Please identify all documents and evidence relating 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 INTERROGATORY NO. 14

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as premature; discovery is in its initial stages, and Common Cause Florida have not yet had the opportunity to fully review all relevant documents or depose any relevant witnesses. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. 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. Common Cause Florida further objects to this Interrogatory as seeking the production of documents.

Subject to the foregoing General and Specific Objections, Common Cause Florida refers the Defendant to their responses and objections to Defendant's First Request for Production to Common Cause Florida.

INTERROGATORY NO. 15

For each Count in your Second Amended Complaint, identify all documents and evidence that supports the rejection of SB 2-C in its entirety (as opposed to the rejection of a specific congressional district)

RESPONSE TO INTERROGATORY NO. 15

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as premature; discovery is in its initial stages, and Common Cause Florida have not yet had the opportunity to fully review all relevant documents or depose any relevant witnesses. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. 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.

Common Cause Florida further objects to this Interrogatory as seeking the production of documents. Common Cause Florida further objects to this Interrogatory as imposing an obligation to produce evidence relating to specific counts of the complaint. Common Cause Florida has no such obligation.

Subject to the foregoing General and Specific Objections, Common Cause Florida will not be producing documents in response to this Request.

INTERROGATORY NO. 16

Identify every congressional district that you claim you have standing in this lawsuit to challenge, and for each congressional district, identify the counts of the Complaint that apply to your challenge.

RESPONSE TO INTERROGATORY NO. 16

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. Common Cause Florida further objects to this Interrogatory as vague and ambiguous, as it is unclear what Defendant means “to challenge” a congressional district and whether counts of the Second Amended Complaint “apply to” a “challenge.”

Subject to the foregoing General and Specific Objections, Common Cause Florida responds that it has standing in CD 13 at minimum and in no way admits to lack standing to challenge SB 2-C in any other district, to the extent relevant.

INTERROGATORY NO. 17

Identify all congressional districts and the respective affected minority population (Black, Hispanic, Asian) that you allege in Count I of the Second Amended Complaint were “intentionally discriminate[d] against” in violation of the Fourteenth Amendment to the U.S. Constitution.

RESPONSE TO INTERROGATORY NO. 17

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. 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 the foregoing General and Specific Objections, Common Cause Florida responds by referring to districts identified in the Second Amended Complaint and that the affected minority population is Black Floridians.

INTERROGATORY NO. 18

Identify all documents and evidence relating to the alleged Constitutional violation in the congressional districts you identify in Interrogatory No. 17.

RESPONSE TO INTERROGATORY NO. 18

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida will not be in a position to provide full and useful answers to

contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. 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. Common Cause Florida further objects to this Interrogatory as seeking the production of documents.

Subject to the foregoing General and Specific Objections, Common Cause Florida refers the Defendant to their responses and objections to Defendant's First Request for Production to Common Cause Florida.

INTERROGATORY NO. 19

Identify all congressional districts and the respective affected minority population (Black, Hispanic, Asian) that you allege in Count II of the Second Amended Complaint that were "intentionally deni[ed]" the "right to vote on the basis of race" in violation of the Fifteenth Amendment to the U.S. Constitution.

RESPONSE TO INTERROGATORY NO. 19

Common Cause Florida incorporates all of the General Objections as if set forth fully herein. Common Cause Florida will not be in a position to provide full and useful answers to contention interrogatories until discovery is complete. Common Cause Florida further objects to this Interrogatory as seeking information that is publicly available, in the possession of the Defendant, and/or can be more easily obtained from others. Common Cause Florida further objects to this Interrogatory as seeking a legal conclusion. 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. Common Cause Florida further objects to this Interrogatory as seeking the production of documents.

Subject to the foregoing General and Specific Objections, Common Cause Florida responds by referring to districts identified in the Second Amended Complaint and that the affected minority population is Black Floridians.

Dated: March 20, 2023

By: /s/ Kathryn Teng
Common Cause Florida