

Exhibit 1

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

COMMON CAUSE FLORIDA, et al.,

Plaintiffs,

v.

CORD BYRD, in his official capacity
as Florida Secretary of State, et al.,

Defendant.

CASE NO. 4:22-CV-109-AW/MAF

FLORIDA SECRETARY OF STATE'S INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendant Florida Secretary of State Cord Byrd (“Defendant”) makes the following initial disclosures:

A. Individuals Likely to Have Discoverable Information Supporting Defendant’s Claims or Defenses.

1. Plaintiffs, both Individuals and Organizations

c/o Patterson Belknap Webb & Tyler LLP

1133 Avenue of the Americas

New York, NY 10036

(212) 336-2000

Subjects: standing to sue

2. The 67 State Supervisors of Elections

Contact information can be found at the following link:

<https://www.myfloridaelections.com/Contact-your-SOE>

Subjects: implementation and appropriateness of any remedy

B. Description of Documents in the Possession, Custody or Control of Defendant that Defendant May Use to Support its Claims or Defenses.

All discoverable information is publicly available at the following links:

<https://www.floridaredistricting.gov/>,

https://fleog.sharepoint.com/sites/Open_Gov/Public%20Record%20Request/Forms/AllItems.aspx?id=%2Fsites%2FOpen%5FGov%2FPublic%20Record%20Request%2FPublic%20Records%20Requests&p=true&ga=1. Otherwise, all other material

in the possession, custody, and control of Defendant is protected by the executive privilege, the legislative privilege, the deliberative process privilege, the attorney-client privilege, and the work-product doctrine.

C. Damages.

Plaintiffs claim the following damages:

1. Attorneys' fees, costs, disbursements, and reasonable attorneys' fees as provided by law.

D. Insurance Agreements.

Not applicable.

E. Reservation of Defendant's Right to Supplement.

Defendant reserves the right to supplement these initial disclosures as discovery progresses.

Dated: December 20, 2022

Respectfully submitted by:

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CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2022, the foregoing document was served via e-mail on the following counsel:

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