

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:24-cv-21983-JB

CUBANOS PA'LANTE, *et al.*,

Plaintiffs,

v.

FLORIDA HOUSE OF
REPRESENTATIVES, *et al.*,

Defendants.

**PLAINTIFFS' ANSWERS TO DEFENDANT HOUSE OF REPRESENTATIVES'
FOURTH REQUEST FOR ADMISSIONS**

Plaintiffs answer and object to Defendant House of Representatives' Fourth Request for Admissions, dated June 16, 2025.

GENERAL STATEMENT AND OBJECTIONS

1. Plaintiffs object to the extent that Defendant House of Representatives' definitions and instructions purport to impose obligations different from or additional to the requirements of the Federal Rules of Civil Procedure, or to limit the discretion of answering parties under the Federal Rules of Civil Procedure.

2. Plaintiffs' answers are based on information now known to them and are provided without prejudice to Plaintiffs' right to assert additional objections or to revise, correct, supplement, clarify, or amend their answers, if Plaintiffs discover additional grounds for objections or additional, responsive information.

3. Plaintiffs provide their answers without waiving or intending to waive, and Plaintiffs expressly preserve, all applicable privileges, exemptions, and protections from discovery. In the answers provided below, Plaintiffs have not withheld any responsive information on the basis of privilege.

DEFINITIONS

For purposes of these requests, voting-age population numbers are based on the 2020 Census.

ANSWERS TO REQUESTS FOR ADMISSION

Request No. 1: Admit that, in the Enacted State House Plan, Districts 112, 113, 114, 115,

116, 118, and 119 contain a combined 850,388 voting-age Hispanics.

Admitted.

Request No. 2: Admit that, in McCartan State House Map A1, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 850,070 voting-age Hispanics.

Admitted.

Request No. 3: Admit that, in McCartan State House Map A2, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 849,306 voting-age Hispanics.

Admitted.

Request No. 4: Admit that, in McCartan State House Map B, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 852,708 voting-age Hispanics.

Admitted.

Request No. 5: Admit that, in McCartan State House Map C1, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 852,973 voting-age Hispanics.

Admitted.

Request No. 6: Admit that, in McCartan State House Map C2, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 854,696 voting-age Hispanics.

Admitted.

Request No. 7: Admit that, in McCartan State House Map C3, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 852,434 voting-age Hispanics.

Admitted.

Request No. 8: Admit that, in McCartan State House Map C4, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 849,238 voting-age Hispanics.

Admitted.

Request No. 9: Admit that, in the Enacted State House Plan, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 268,831 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 10: Admit that, in McCartan State House Map A1, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 268,544 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 11: Admit that, in McCartan State House Map A2, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 268,548 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 12: Admit that, in McCartan State House Map B, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 271,355 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 13: Admit that, in McCartan State House Map C1, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 271,543 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 14: Admit that, in McCartan State House Map C2, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 271,155 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Admitted.

Request No. 15: Admit that, in McCartan State House Map C3, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 271,418 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 16: Admit that, in McCartan State House Map C4, Districts 112, 113, 114, 115, 116, 118, and 119 contain a combined 271,337 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 17: Admit that, in the Enacted Congressional Plan, District 26 contains 153,057 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 18: Admit that, in McCartan Congressional Map A, District 26 contains 167,074 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 19: Admit that, in McCartan Congressional Map B1, District 26 contains 166,990 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 20: Admit that, in McCartan Congressional Map B2, District 26 contains 105,439 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 21: Admit that, in McCartan Congressional Map C1, District 26 contains 167,074 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 22: Admit that, in McCartan Congressional Map C2, District 26 contains 167,074 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 23: Admit that, in McCartan Congressional Map D, District 26 contains 167,074 registered Republicans (according to 2020 general-election data in the Legislature's map-drawing application).

Denied.

Request No. 24: Admit that District 120 in McCartan State House Maps A1, A2, B, and C1 is identical to District 120 in the Enacted State House Plan.

Admitted.

Request No. 25: Admit that, with the exception of three unpopulated census blocks over Biscayne Bay, District 120 in McCartan State House Maps C2, C3, and C4 is identical to District 120 in the Enacted State House Plan.

Admitted.

Request No. 26: Admit that all seven of Dr. McCartan's State House Maps split Goulds and South Miami Heights in the same way that the Enacted State House Plan does.

Admitted.

Request No. 27: Admit that, compared to the Enacted Congressional Plan, McCartan Congressional Map A alters the following 13 districts: Districts 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, and 28.

Admitted.

Request No. 28: Admit that, compared to the Enacted Congressional Plan, McCartan Congressional Map B1 alters the following 15 districts: Districts 11, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, and 28.

Admitted.

Request No. 29: Admit that, compared to the Enacted Congressional Plan, McCartan Congressional Map B2 alters the following 15 districts: Districts 11, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, and 28.

Admitted.

Request No. 30: Admit that, compared to the Enacted Congressional Plan, McCartan Congressional Map C1 alters the following 18 districts: Districts 8, 9, 10, 11, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, and 28.

Admitted.

Request No. 31:

Admit that, compared to the Enacted Congressional Plan, McCartan Congressional Map C2 alters the following 18 districts: Districts 8, 9, 10, 11, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, and 28.

Admitted.

Request No. 32: Admit that, compared to the Enacted Congressional Plan, McCartan Congressional Map D alters the following 20 districts: Districts 6, 7, 8, 9, 10, 11, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, and 28.

Admitted.

Request No. 33: Admit that, within Collier County, the Hispanic voting-age population (HVP) of Enacted Congressional District 26 is 31.8 percent.

Admitted.

Request No. 34: Admit that, within Collier County, the Hispanic voting-age population (HVP) of Enacted Congressional District 18 is 84.2 percent.

Admitted.

Request No. 35: Admit that, within Collier County, the Hispanic voting-age population (HVP) of Enacted Congressional District 19 is 12.0 percent.

Admitted.

Request No. 36: Admit that, according to the 2020 decennial census, the Hispanic voting-age population (HVP) of the City of Hialeah is 96.1 percent.

Admitted.

Request No. 37: Admit that, according to the 2020 decennial census, the Hispanic voting-age population (HVP) of the City of Hialeah Gardens is 96.5 percent.

Admitted.

Request No. 38: Admit that, according to the 2020 decennial census, the Hispanic voting-age population (HVP) of the Town of Medley is 96.5 percent.

Admitted.

Dated: August 22, 2025

/s/ Nicholas L.V. Warren

Nicholas L.V. Warren (FBN 1019018)
Daniel B. Tilley (FBN 102882)
Caroline A. McNamara (FBN 1038312)
ACLU Foundation of Florida
4343 West Flagler Street, Suite 400
Miami, FL 33134
(786) 363-1769
nwarren@aclufl.org
dtalley@aclufl.org
cmcnamara@aclufl.org

Jorge L. Vasquez, Jr.*
Vasquez Attorneys at Law, PC
141 Parkway Road, Suite 14
Bronxville, NY 10708
(212) 752-8408
jorge@vasquezpc.com

**Admitted pro hac vice*

Andrew Frackman*
O'Melveny & Myers LLP
1301 Avenue of the Americas, 17th Floor
New York, NY 10019
(212) 326-2000
afrackman@omm.com

Brian P. Quinn*
Patrick J. Jones*
Emily Murphy*
Gabrielle S. Jackson*
Andrea Ojeda*
O'Melveny & Myers LLP
1625 Eye Street NW
Washington, DC 20006
(202) 383-5300
bquinn@omm.com
pjones@omm.com
emurphy@omm.com
gjackson@omm.com
aojeda@omm.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on counsel for all parties by email on August 22, 2025.

/s/ Nicholas L.V. Warren
Nicholas L.V. Warren
Counsel for Plaintiffs