

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

CUBANOS PA'LANTE, *et al.*,

Plaintiffs,

v.

FLORIDA HOUSE OF REPRESENTATIVES
and CORD BYRD, in his official capacity as
Florida Secretary of State,

Defendants.

**THE FLORIDA HOUSE OF REPRESENTATIVES'
SECOND AMENDED INITIAL DISCLOSURE**

Defendant, the Florida House of Representatives (the "House"), makes this initial disclosure pursuant to Federal Rule of Civil Procedure 26(a)(1). The House's review of Plaintiffs' allegations is ongoing. The House will supplement this disclosure in a timely manner if it learns that in any material respect the disclosure is incomplete or incorrect, and the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing.

The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Name, Address, and Telephone Number	Subjects of Information
Jason Poreda Chief Map Drawer House Redistricting Committee <i>* Contact through undersigned counsel</i>	The redistricting process, the enacted congressional and State House maps, and the challenged districts.

PLAINTIFFS' TRIAL
EXHIBIT

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exhibitster.com

A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

- Redistricting maps and data available at <https://www.floridaredistricting.gov>.
- Redistricting maps and data produced by the House on April 24, 2025. *See* HOUSE_000001–HOUSE_000194.
- Voter-registration data available at <https://www.miamidade.gov/elections/voter-statistics-current-archive.html>.
- Records of legislative proceedings—including journals; recordings; committee publications; and meeting notices, agendas, and packets—available at:
 - <https://www.myfloridahouse.gov>
 - <https://flsenate.gov>
 - <https://thefloridachannel.org/videos>
- Transcripts of legislative floor sessions and committee and subcommittee meetings. *See* HOUSE_000195–HOUSE_004821.
- Any documents attached to, referenced in, or produced in support of—and tables and figures contained in—the expert report of Sean P. Trende, Ph.D.
- Any documents attached to, referenced in, or produced in support of—and tables and figures contained in—the expert report of Alfredo L. Gonzalez.
- Plaintiffs’ responses to written discovery and documents produced by Plaintiffs in response to requests for production.

A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Inapplicable.

For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Inapplicable.

Dated June 5, 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on June 5, 2025, a true and correct copy of the foregoing was served by email on all counsel identified on the Service List that follows.

/s/ *Andy Bardos*

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