

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.

DEFENDANT FLORIDA HOUSE OF REPRESENTATIVES' PRIVILEGE LOG

Pursuant to Federal Rule of Civil Procedure 26(b)(5)(A), Defendant, the Florida House of Representatives, serves this privilege log in response to Plaintiffs' First Request for Production on the Florida House of Representatives, dated July 10, 2024.¹

¹ In addition to the objections noted below, the House has objected to the production of documents on the basis of the legislative privilege. The assertion of the legislative privilege in a case such as this obviates the need to prepare a privilege log. *See In re Hubbard*, 803 F.3d 1298, 1311 (11th Cir. 2015) ("Because the only remaining claim . . . struck at the heart of the legislative privilege, and none of the information sought could have been outside the privilege, there was no need for the lawmakers to peruse the subpoenaed documents, to specifically designate and describe which documents were covered by the legislative privilege, or to explain why the privilege applied to those documents."); *Pernell v. Fla. Bd. of Govs. of State Univ.*, 84 F.4th 1339 (11th Cir. 2023) (relying on *Hubbard* to reject a "document-by-document" approach to the legislative privilege). The House expressly maintains its legislative-privilege objections, and the service of this privilege log to identify other privilege objections is not a concession that a privilege log is required.

No.	Date	Author	Type of Document	Subject Matter	Attachment To	Privilege
1.	10/8/2021	Committee Staff of the Florida House of Representatives	Excel	Information for expert consultants regarding benchmark congressional districts	Privilege Log Entry No. 33	Work Product
2.	10/8/2021	Committee Staff of the Florida House of Representatives	Excel	Information for expert consultants regarding benchmark State House districts	Privilege Log Entry No. 33	Work Product
3.	10/8/2021	Andy Bardos	Word	Summary for expert consultants of available election data.	Privilege Log Entry No. 33	Work Product
4.	10/10/2021	Expert Consultants John Alford & Randy Stevenson	Word	Expert consultants' request and specifications for election data.	Privilege Log Entry No. 35	Work Product
5.	10/18/2021	Expert Consultants John Alford & Randy Stevenson	Word	Expert consultants' request for information regarding election data.	Privilege Log Entry No. 44	Work Product

No.	Date	Author	Type of Document	Subject Matter	Attachment To	Privilege
6.	10/20/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in congressional and State House districts	Privilege Log Entry No. 50	Work Product
7.	10/21/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in congressional and State House districts	Privilege Log Entry No. 51	Work Product
8.	10/27/2021	Leda Kelly	Word	Questions for expert consultants regarding data analysis of voting cohesion and racially polarized voting in congressional and State House districts	Privilege Log Entry No. 53	Work Product
9.	11/1/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in congressional and State House districts	Privilege Log Entry No. 58	Work Product

No.	Date	Author	Type of Document	Subject Matter	Attachment To	Privilege
10.	11/1/2021	Expert Consultants John Alford & Randy Stevenson	PDF	Data analysis of voting cohesion and racially polarized voting in benchmark congressional districts	Privilege Log Entry No. 58	Work Product
11.	11/1/2021	Expert Consultants John Alford & Randy Stevenson	PDF	Data analysis of voting cohesion and racially polarized voting in benchmark State House districts	Privilege Log Entry No. 58	Work Product
12.	11/9/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in benchmark congressional and State House districts	Privilege Log Entry No. 61	Work Product
13.	11/9/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in benchmark congressional districts	Privilege Log Entry No. 61	Work Product
14.	11/9/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in benchmark State House districts	Privilege Log Entry No. 61	Work Product

No.	Date	Author	Type of Document	Subject Matter	Attachment To	Privilege
15.	11/17/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in congressional and State House districts	Privilege Log Entry No. 64	Work Product
16.	11/17/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in congressional and State House districts	Privilege Log Entry No. 66	Work Product
17.	11/19/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in congressional and State House districts	Privilege Log Entry No. 67	Work Product
18.	11/22/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in congressional and State House districts	Privilege Log Entry No. 69	Work Product

No.	Date	Author	Type of Document	Subject Matter	Attachment To	Privilege
19.	11/29/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in benchmark congressional and State House districts	Privilege Log Entry No. 73	Work Product
20.	12/14/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in H000C8001	Privilege Log Entry No. 83	Work Product
21.	12/17/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in H000C8001 and H000C8003	Privilege Log Entry No. 86	Work Product
22.	12/17/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in H000H8005 and H000H8007	Privilege Log Entry No. 86	Work Product
23.	12/19/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in H000C8001 and H000C8003	Privilege Log Entry No. 88	Work Product

No.	Date	Author	Type of Document	Subject Matter	Attachment To	Privilege
24.	12/19/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in H000H8005 and H000H8007	Privilege Log Entry No. 88	Work Product
25.	12/19/2021	Expert Consultants John Alford & Randy Stevenson	PDF	Data analysis of voting cohesion and racially polarized voting in H000H8005	Privilege Log Entry No. 88	Work Product
26.	12/19/2021	Expert Consultants John Alford & Randy Stevenson	PDF	Data analysis of voting cohesion and racially polarized voting in H000H8007	Privilege Log Entry No. 88	Work Product
27.	12/26/2021	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in S000C8018 and S000C8022	Privilege Log Entry No. 89	Work Product
28.	1/16/2023	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in Congressional District 10	Privilege Log Entry No. 96	Work Product

No.	Date	Author	Type of Document	Subject Matter	Attachment To	Privilege
29.	2/3/2023	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in H000H8013	Privilege Log Entry No. 103	Work Product
30.	3/1/2023	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in H000H8015		Work Product
31.	3/1/2023	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in H000H8017		Work Product
32.	4/27/2022	Expert Consultants John Alford & Randy Stevenson	Excel	Data analysis of voting cohesion and racially polarized voting in P000C0109	Privilege Log Entry No. 113	Work Product

Emails

No.	Date	Time	From	To	CC	Subject Matter	Privilege
33.	10/8/2021	5:26 PM	Andy Bardos	John Alford; Randy Stevenson	George Levesque	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
34.	10/10/2021	7:51 PM	Andy Bardos	John Alford		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
35.	10/10/2021	6:46 PM	John Alford	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
36.	10/13/2021	9:47 PM	George Levesque	John Alford	Randy Stevenson; Andy Bardos	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
37.	10/13/2021	9:40 PM	John Alford	George Levesque; Randy Stevenson	Andy Bardos	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
38.	10/13/2021	9:54 PM	John Alford	George Levesque	Randy Stevenson; Andy Bardos	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
39.	10/13/2021	6:46 PM	Andy Bardos	John Alford		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
40.	10/13/2021	1:37 PM	Andy Bardos	John Alford		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
41.	10/13/2021	2:00 PM	John Alford	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
42.	10/14/2021	11:27 AM	Andy Bardos	John Alford		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
43.	10/17/2021	8:52 PM	Andy Bardos	John Alford; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
44.	10/18/2021	11:15 AM	John Alford	Andy Bardos; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
45.	10/19/2021	3:54 PM	Andy Bardos	John Alford; George Levesque		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
46.	10/19/2021	3:27 PM	John Alford	Andy Bardos; George Levesque		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
47.	10/19/2021	10:30 AM	Andy Bardos	John Alford; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
48.	10/19/2021	4:21 PM	John Alford	Andy Bardos	George Levesque	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
49.	10/20/2021	3:31 PM	Andy Bardos	John Alford; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
50.	10/20/2021	3:07 PM	John R. Alford	Andy Bardos; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
51.	10/21/2021	9:54 AM	John R. Alford	Andy Bardos; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
52.	10/22/2021	4:14 PM	Andy Bardos	John Alford; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
53.	10/27/2021	7:15 PM	Andy Bardos	John Alford; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
54.	10/29/2021	3:55 PM	Andy Bardos	John Alford		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
55.	10/29/2021	11:39 AM	John Alford	Andy Bardos	George Levesque	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
56.	10/29/2021	3:51 PM	John Alford	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
57.	10/29/2021	3:43 PM	Andy Bardos	John Alford	George Levesque	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
58.	11/1/2021	10:55 AM	John Alford	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
59.	11/5/2021	10:35 AM	John Alford	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
60.	11/7/2021	10:07 AM	Andy Bardos	John Alford		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
61.	11/9/2021	1:13 PM	John Alford	George Levesque; Andy Bardos	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
62.	11/14/2021	11:54 AM	Andy Bardos	John Alford		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
63.	11/17/2021	10:22 AM	Andy Bardos	John Alford		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
64.	11/17/2021	11:20 PM	John Alford	Andy Bardos	George Levesque	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
65.	11/17/2021	11:04 AM	John Alford	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
66.	11/17/2021	9:53 PM	Randy Stevenson	George Levesque	Randy Stevenson; John Alford; Tim Moore; Andy Bardos	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
67.	11/19/2021	11:07 AM	John Alford	Andy Bardos; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
68.	11/19/2021	10:57 PM	Andy Bardos	John Alford; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
69.	11/22/2021	8:57 AM	John Alford	Andy Bardos; George Levesque	Randy Stevenson; John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
70.	11/22/2021	9:06 AM	Andy Bardos	John Alford; George Levesque	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
71.	11/23/2021	11:06 AM	John Alford	Andy Bardos	George Levesque; Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
72.	11/24/2021	3:02 PM	Andy Bardos	John Alford	George Levesque; Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
73.	11/29/2021	10:36 PM	John Alford	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
74.	12/7/2021	10:19 PM	Andy Bardos	John Alford		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
75.	12/8/2021	12:03 AM	John Alford	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
76.	12/12/2021	4:35 PM	Andy Bardos	John Alford		Communications related to expert data analysis of voting cohesion and racially polarized voting (Attachments: H000C8001, H000C8003, H000C8005, H000C8007, and eight block-assignment files)	Work Product
77.	12/13/2021	1:43 PM	Randy Stevenson	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
78.	12/13/2021	1:59 PM	Andy Bardos	Randy Stevenson		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
79.	12/13/2021	2:05 PM	Randy Stevenson	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
80.	12/13/2021	7:03 PM	Randy Stevenson	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
81.	12/13/2021	4:45 PM	Randy Stevenson	Andy Bardos	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
82.	12/13/2021	3:21 PM	Randy Stevenson	Andy Bardos	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting (Attachment: Precinct List)	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
83.	12/14/2021	12:38 PM	Randy Stevenson	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
84.	12/15/2021	6:20 PM	Randy Stevenson	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
85.	12/16/2021	3:25 PM	Randy Stevenson	Andy Bardos	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
86.	12/17/2021	2:54 PM	Randy Stevenson	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
87.	12/18/2021	11:08 AM	Randy Stevenson	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
88.	12/19/2021	6:57 PM	Randy Stevenson	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
89.	12/26/2021	11:11 PM	John Alford	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
90.	12/28/2021	5:00 PM	John Alford	Andy Bardos; Randy Stevenson	George Levesque	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
90.	12/28/2021	7:19 PM	John Alford	Andy Bardos	Randy Stevenson; George Levesque	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
91.	12/29/2021	11:04 AM	John Alford	Andy Bardos; Randy Stevenson	George Levesque	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
92.	1/15/2022	11:24 AM	Andy Bardos	John Alford; Randy Stevenson		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
93.	1/15/2022	1:39 PM	Randy Stevenson	Andy Bardos	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
94.	1/15/2022	10:02 PM	Andy Bardos	Randy Stevenson	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting (Attachment: Orange County election data)	Work Product
95.	1/16/2022	9:39 PM	John Alford	Andy Bardos	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
96.	1/16/2022	4:38 PM	Randy Stevenson	Andy Bardos	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
97.	1/17/2022	7:32 PM	Andy Bardos	John Alford	Randy Stevenson	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
98.	1/30/2022	10:20 PM	Andy Bardos	John Alford; Randy Stevenson		Communications related to expert data analysis of voting cohesion and racially polarized voting (Attachments: H000H8013 and nine block-assignment files)	Work Product
99.	1/30/2022	10:05 PM	Andy Bardos	Randy Stevenson	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
100.	1/31/2022	10:52 AM	Randy Stevenson	Andy Bardos	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
101.	1/31/2022	3:57 PM	Randy Stevenson	Andy Bardos	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
102.	1/31/2022	10:35 PM	Andy Bardos	Randy Stevenson	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
103.	2/3/2022	1:10 PM	Randy Stevenson	Andy Bardos	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
104.	2/3/2022	2:42 PM	Andy Bardos	Randy Stevenson	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
105.	2/14/2022	8:56 AM	Andy Bardos	Randy Stevenson	John Alford	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
106.	2/28/2022	6:03 PM	George Levesque	Randy Stevenson	John Alford; Andy Bardos; Ashley Lukis	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
107.	2/28/2022	5:56 PM	Randy Stevenson	George Levesque	John Alford; Andy Bardos; Ashley Lukis	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
108.	3/1/2022	8:54 PM	George Levesque	Leda Kelly	Andy Bardos; Ashley Lukis	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
109.	3/1/2022	1:37 PM	George Levesque	Randy Stevenson	John Alford; Andy Bardos; Ashley Lukis	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
110.	3/7/2022	2:52 PM	Andy Bardos	John Alford; Randy Stevenson	George Levesque; Ashley Lukis	Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
111.	4/25/2022	10:35 AM	Andy Bardos	John Alford; Randy Stevenson		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
112.	4/25/2022	11:16 AM	Randy Stevenson	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
113.	4/27/2022	12:19 PM	Randy Stevenson	Andy Bardos		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product
114.	4/28/2022	9:25 AM	Andy Bardos	Leda Kelly		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

No.	Date	Time	From	To	CC	Subject Matter	Privilege
115.	4/28/2022	9:24 AM	Andy Bardos	Randy Stevenson		Communications related to expert data analysis of voting cohesion and racially polarized voting	Work Product

Dated August 23, 2024.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on August 23, 2024, 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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