

**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'
OMNIBUS NOTICE OF TAKING CORPORATE DEPOSITIONS

TO: All Counsel of Record

PLEASE TAKE NOTICE that Defendant, the Florida House of Representatives, by and through undersigned counsel, and pursuant to the Federal Rules of Civil Procedure, will take the following depositions:

Name of Deponent	Date and Time	Location
FIU ACLU Club	June 26, 2025 08:30 a.m.	Continental PLLC 255 Alhambra Circle, Suite 640 Coral Gables, Florida 33134
Engage Miami Inc,	June 27, 2025 2:00 p.m.	Continental PLLC 255 Alhambra Circle, Suite 640 Coral Gables, Florida 33134
Cubanos Pa'Lante	July 10, 2025 2:00 p.m.	Continental PLLC 255 Alhambra Circle, Suite 640 Coral Gables, Florida 33134

The examinations will take place before a court reporter who is authorized by law to take depositions in the State of Florida.

EXHIBIT

D117

This deposition is being taken for the purpose of discovery, for use as evidence, and for such other uses and purposes as are permitted under the Federal Rules of Civil Procedure and other applicable law. Pursuant to Federal Rule of Civil Procedure 30(b)(6), attached is Exhibit 1 identifying the topics for the corporate depositions.

This deposition shall be recorded by stenographic means and shall continue from day to day until completed.

Dated: June 09, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on June 09, 2025, a true and correct copy of the foregoing was served by email on all counsel identified on the Service List that follows.

/s/ Carmen Manrara Cartaya

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EXHIBIT 1

Cubanos Pa'lante et al. vs. Florida House of Representatives, et al.
Case No. 1:24-cv-21983

**Federal Rule of Civil Procedure 30(b)(6)
Corporate Deposition Topics**

Pursuant to Federal Rule of Civil Procedure 30(b)(6), the following topics are noticed for Plaintiffs: FIU ACLU Club, Cubanos Pa'lante,¹ and Engage Miami Inc. (hereinafter, individually referred to as the "Entity"). For these topics, the relevant Florida House Districts are 112, 113, 114, 115, 116, 118, 119 (hereinafter, the "House Districts") and Congressional District 26 (hereinafter, "District 26") (collectively, the House Districts and District 26 are the "Challenged Districts").

1. For each Challenged District, information about the Entity's members, including:
 - a. Complete current address of each Entity member; and
 - b. The Challenged District where each Entity member presently resides.
2. From 2022 through the present, information regarding (i) eligibility to vote; (ii) registered political party; (iii) elections each member has voted in; and (iv) method each member voted (*i.e.* early voting; absentee ballot, etc.). This request is for the following Entity members:
 - a. Engage Miami Inc.
 - i. Rebecca Pelham
 - ii. Monica A. Bustinza
 - iii. Isa Zuluaga
 - b. FIU ACLU Club
 - i. Enrique Cruz
 - ii. Genesis M. Castilla Falcon
 - iii. Adem Seker
3. The Entity's organizational purpose, including:
 - a. Entity's goals and mission; and
 - b. Date Entity was established.
4. The Entity's organizational structure, including:
 - a. Criteria to become a member of leadership;
 - b. Description of leadership positions;

¹ Topics 1 and 5(a) apply to the information already disclosed by Plaintiff Cubanos Pa'lante consistent with paragraph 2 of the stipulation entered on January 30, 2025.

- c. Duties of leadership positions; and
 - d. Frequency of meetings, both in person and virtual.
- 5. The Entity's leadership and members (from 2023 through the present), including:
 - a. Name and current address;
 - b. Name and title of each leadership member; and
 - c. Present number of members for each Entity.
- 6. Membership requirements, including:
 - a. How individuals become members;
 - b. Meeting attendance;
 - c. Membership fees;
 - d. Fundraising requirements and activities;
 - e. Participation in events;
 - f. Rights and privileges of membership;
 - g. Financial responsibilities or expectations of membership; and
 - h. Membership responsibilities.
- 7. Activities, events, education, and programming done by the Entity, including:
 - a. When the events took place;
 - b. Who attended the events; and
 - c. Any activities, events, education, and programming regarding redistricting.
- 8. Details about initiating the *Cubanos* litigation, including:
 - a. Whether and how membership was consulted before initiating the suit;
 - b. Voting process, if any, in determining whether to initiate the suit;
 - c. Any dissent or opposition to the suit; and
 - d. Selection of individual Plaintiffs.
- 9. Factual allegations in Second Amended Complaint, including:
 - a. Understanding of relief sought;
 - b. Communities that were allegedly divided by Challenged Districts;
 - c. Details about the Entity's relationship to these communities of interest;
 - d. Commonalities and differences between communities of interest that were "sacrificed" in the Challenged Districts and corresponding harm allegedly suffered by each Entity as described in paragraph 18; and
 - e. Explanation of how the Challenged Districts were drawn along racial lines.
- 10. The Entity's involvement in the *Cubanos* litigation, including:

- a. When Entity first began to have any concerns with the Congressional or House maps;
 - b. When Entity first began to consider possible litigation for South Florida voting districts;
 - c. Goals in participating in *Cubanos* suit;
 - d. Understanding of *Cubanos* suit;
 - e. Reasons behind initiating *Cubanos* suit; and
 - f. Relationship between the *Cubanos* suit and the Entity's purpose.
11. Communications and involvement with the American Civil Liberties Union, the national organization, and the Florida ACLU state affiliate organization (collectively both entities referred to herein as the "ACLU"), including:
 - a. Identity of ACLU members the Entity communicates with;
 - b. Frequency of these communications; and
 - c. Details about the discussions with the ACLU.
12. Fees and costs for the *Cubanos* litigation, including:
 - a. Responsibility to pay for costs and attorneys' fees for *Cubanos* suit;
 - b. Approximate amount of costs and attorneys' fees paid by the Entity to the present for the *Cubanos* suit; and
 - c. Source and amount of any donations, either monetary, in-kind, or *pro bono*, to facilitate the *Cubanos* suit, including to cover attorneys' fees and costs.
13. The manner and frequency with which the Entity updates its members on the *Cubanos* litigation.
14. Description of any harm, damages, or impact experienced from the Challenged Districts, including information tending to show the Challenged Districts caused harm to the Entity, members of the Entity, and other residents.
15. Communications between and among Cindy Polo, Genesis M. Castilla Falcon, Diana Belbruno, Luis Sorto, and the Entities, including the frequency, method, and subject matter of any communications.
16. The Entity's interrogatory responses in the *Cubanos* litigation, including but not limited to:
 - a. Responses (including supplemental responses where applicable) to Interrogatory Nos. 3, 4, 5, 6, and 7 of the House's First Set of Interrogatories to the Entity; and
 - b. Responses (including supplemental responses where applicable) to Interrogatory Nos. 1, 2, 3, 4, and 5 of the House's Second Set of Interrogatories to the Entity.
17. The Entity's communications with elected officials (both current and former) regarding redistricting, including but not limited to:

- a. Representative Fentrice Driskell;
- b. Representative Anna V. Eskamani;
- c. Former Senator Annette Taddeo;
- d. Former Senator Geraldine Thompson;
- e. Former Senator Gary Farmer
- f. Representative Dotie Joseph;
- g. Representative Susan Valdés;
- h. Representative Nicholas X. Duran; and
- i. Senator Carlos Guillermo Smith.

- 18. The Entity's participation or non-participation in the 2021–22 legislative process that resulted in the enactment of the current Congressional and State House redistricting plans.
- 19. The Entity's knowledge about the alternative maps prepared for *Cubanos* litigation and Entity's participation in creating the proposed maps.