

**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.

**PLAINTIFF ACLU FIU CLUB'S SECOND SUPPLEMENTAL RESPONSES TO
DEFENDANT FLORIDA HOUSE OF REPRESENTATIVES'
FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and the Local Rules of the U.S. District Court for the Southern District of Florida ("Local Rules"), Plaintiff ACLU FIU Club ("Plaintiff"), by and through its undersigned counsel, hereby supplements its August 22, 2024 responses and objections to Defendant House of Representatives First Set of Interrogatories ("Interrogatories"), dated July 23, 2024. These responses and objections are made to the best of Plaintiff's present knowledge, information, and belief, and are provided without prejudice to Plaintiff's right to amend, clarify, and/or supplement these responses and objections at a later time for any reason.

PRELIMINARY STATEMENT

1. Plaintiff's counsel is prepared to meet and confer with the House's counsel about any disputes concerning the meaning, scope, and relevance of the House's Interrogatories or these Responses and Objections.
2. Each response below is on behalf of ACLU FIU Club and no other entity or individual.
3. The following objections are made without waiving but, instead, preserving: (a) the right to raise all questions of, and to object to, the authenticity, competence, foundation, relevancy, materiality, privilege, and/or admissibility of any information or document provided or identified in response to the Interrogatories; (b) the right to object on any ground to the use or introduction into evidence of any information or any document in any subsequent proceeding or in the trial of this or any other action on any ground; and (c) the right to object on any ground at any time to

additional discovery.

4. As of the date of this response, Plaintiff has not completed its discovery and investigation of the facts in this case, has not completed its review and production of relevant documents, and has not completed its preparation for summary judgment and, if necessary, trial. Accordingly, the responses and objections set forth below are based on information presently known and reasonably available to Plaintiff at this time after a diligent search and reasonable and good-faith inquiry. Plaintiff reserves the right to: (a) amend, alter, supplement, clarify, or otherwise modify these Responses and Objections; (b) make use of, or introduce at any hearing or trial, any documents, information, facts, evidence, and legal theories which are subsequently discovered or which are now known but whose relevance, significance, or applicability has not yet been ascertained; and (3) offer expert witness opinions or testimony on any relevant matter, which opinions or testimony may be at variance with these Responses and Objections or the documents and information referenced in these Responses and Objections or produced in response to the Requests.

5. The Responses and Objections set forth below shall not be construed as any admission that Plaintiff adopts or agrees with any definition, premise, characterization, or legal conclusion in any Interrogatories.

6. Any inadvertent disclosure of privileged or protected information or documents shall not be deemed a waiver of any privilege. The House shall notify Plaintiff of any inadvertently disclosed privileged or protected information or documents pursuant to Federal Rule of Civil Procedure 26(b)(5)(B) and/or any procedures for doing so in any orders governing discovery in this litigation. The House must not use any privileged or protected information or documents inadvertently disclosed. In addition, nothing herein is intended to be, or should be construed as, a waiver of any privilege.

7. Plaintiff objects to each of the House's Definitions, Instructions, and Interrogatories to the extent that they seek to impose on Plaintiff any obligations not required by the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Southern District of Florida, any protocol governing the production of documents and/or information in this action, the orders of this Court, and/or any agreements of the parties with respect to document collection, search, and/or production.

INTERROGATORY NO. 3: Separately for each challenged district, identify by name and address of legal residence at least one member of ACLU FIU Club who is registered to vote in the district.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:

CD	HD	First Name	Last Name	Address	City
26	109	Enrique	Cruz	1629 NW 14th St Apt 103	Miami
26	110	Melanie	Mahmoodi	6240 NW 199th St	Hialeah
26	110	Ivanna	Rodriguez	18340 NW 62nd Ave Apt 412	Hialeah
26	110	David	Brito-Murphy	9015 NW 168th Ter	Miami Lakes
26	110	Katherine	Sanfeliz Alfonso	6870 W 7th Ave Apt 24B	Hialeah
26	111	German	Mata Martinez	9921 W Okeechobee Rd Apt 523D	Hialeah Gardens
26	112	Cristy	Leiva	1940 Miami Springs Ave	Miami Springs
27	113	Natalie	Sandoval	2010 SW 25th Ter Apt 404	Miami
27	114	Claudia	Del Rio	7915 NW 8th St Unit 3B	Miami
27	115	Kayla	Monjarretz	7201 SW 34th Street Rd	Miami
28	116	Paris	Yearby	1599 SW 113th Ave Apt 302D	Miami
28	116	Samuel	Vogel	1599 SW 113th Ave Apt 511A	Miami
28	116	Victoria	Aguilar	795 SW 110th Ave Apt 1813	Sweetwater
28	116	Amelia	Narvaez-Matos	3250 SW 116th Pl	Miami
27	116	Jennifer	Marenco	1440 SW 104th Path Apt S-203	Miami
27	116	Helen	Capote	5025 SW 114th Ave	Miami
28	116	Mirabella	Budetti	795 SW 110th Ave Apt 1002	Miami
28	116	Kailey	Mckenzie	11201 SW 17th St Apt TAM1217A	Miami
27	116	Nicolas	Stolarczyk	9041 SW 57th Ter	Miami
28	116	Ciara	Colon	1595 SW 112th Ave Apt 202	Miami
28	116	Medjie	Mescharles	11201 SW 17th St Bldg 413	Miami
28	118	Genesis	Castilla Falcon	9030 SW 125th Ave Apt 201	Miami
28	118	Andres	Sanchez-Hernandez	2605 SW 133rd Ave	Miami
28	118	Mia	Orta	3237 SW 143rd Pl	Miami
28	119	Soichi	Ystokazu Gomez	10233 SW 143rd Ave	Miami
28	119	Roxana	Echevarria	21045 SW 150th Ave	Miami
28	119	Krizia	Quarta	9112 SW 142nd Path	Miami
28	119	Isabella	Verdecia	15117 SW 30th St	Miami
28	119	Emily	Saez	15921 SW 86th Ter	Miami
28	119	Isabella	Cardona	15100 SW 116th St	Miami

Dated June 20, 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, Inc.
4343 West Flagler Street, Suite 400
Miami, FL 33134
(786) 363-1769
nwarren@aclufl.org
dtilley@aclufl.org
cmcnamara@aclufl.org

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

**Admitted pro hac vice*

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

VERIFICATION

I have read the foregoing Second Supplemental Responses to Defendant House of Representatives' First Set of Interrogatories and know its contents. While I have relied on others to compile and prepare these responses, I am informed and believe that the matters stated therein are true and correct, and on that basis verify the responses, reserving the right to, in the event new, additional, or different information is discovered, revise or supplement the responses as appropriate.

I declare under penalty of perjury that the foregoing is true and correct.

Enrique Cruz

Enrique Cruz

Dated: 06/23/2025

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on counsel for all parties by email on June 25, 2025.

/s/ Nicholas L.V. Warren

Nicholas L.V. Warren

Counsel for Plaintiffs