

**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.*

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**PLAINTIFF ENGAGE MIAMI'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 Engage Miami's ("Plaintiff" or "Engage"), 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 Engage Miami 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 Engage Miami who is registered to vote in the district.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:**

CD	HD	First Name	Last Name	Address	City
26	109	Francisco	Fuentes	2981 NW 29th St	Miami
26	109	Jesus	Taveras	1330 NW 34th St	Miami
26	109	Tyler	Taveras	1330 NW 34th St	Miami
26	109	Vaughan	Johnson	1036 NW 29th Ter Apt 3	Miami
26	109	Jahneé	Smith	1545 NW 15th Street Rd Apt 805	Miami
26	110	Isabella	Carbajales	8911 NW 166th Ter	Miami Lakes
26	112	Banesa	Santamaria	674 SE Park Dr Apt 2	Hialeah
27	113	Angel	Montalvo	2911 SW 21st Ter	Miami
27	113	Amy	Morales	829 SW 9th Ave	Miami
27	113	Mark	Perez	125 SW 18th Ct Apt 2	Miami
27	113	Julia	Del Rivero	1650 Coral Way Apt 707	Miami
27	113	Cinthya Yahoska	Orozco	961 SW 7th St Apt 312	Miami
27	114	Mattias	Manzano	5661 Marius St	Miami
27	114	Mateo	Rivera	2263 Douglas Rd Apt 722	Miami
27	115	John	Mendia	7901 Sunset Dr	Miami
27	115	Alejandro	Agudelo	7265 SW 89th St Apt 211A	Miami
27	115	Ibis	Alcala	1400 SW 82nd Ave	Miami
27	115	Gabrielle	Bogert	12701 SW 72nd Ave	Pinecrest
27	116	Maria Victoria	Chacon-Briceno	11866 SW 97th Ter	Miami
27	116	Santiago	Rivera	8838 W Flagler St Apt 106	Miami
27	116	Sarah	Alcantara	8911 SW 113Th Place Cir W	Miami
28	116	Carley	Odneal	700 SW 107th Ave # 914	Miami
28	116	Mailynn	Lam	9731 SW 5th St	Miami
27	116	Catarina	Fernandez	8415 SW 107th Ave Apt 226W	Miami
28	118	Daniel	Mendoza	14271 SW 74th St	Miami
28	119	Zuzelle	Ramos	17331 SW 150th Ct	Miami
28	119	Shanelle	Reid	16570 SW 145th Ave	Miami

Dated June 20, 2025.

/s/ Nicholas L.V. Warren

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*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.



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Rebecca Pelham

Dated: June 20, 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*