

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 DIANA BELBRUNO'S ANSWERS TO DEFENDANT HOUSE OF
REPRESENTATIVES' FIRST REQUEST FOR ADMISSIONS**

Plaintiff Diana Belbruno answers and objects to Defendant House of Representatives' First Request for Admissions, dated January 10, 2025, as follows:

Request No. 1: Admit that House District 112 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 2: Admit that House District 113 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 3: Admit that House District 114 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 4: Admit that House District 115 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 5: Admit that House District 116 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal

conclusion.

Request No. 6: Admit that House District 118 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 7: Admit that House District 119 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 8: Admit that Congressional District 26 complies with the compactness standard in article III, 20(b) section of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 9: Admit that Congressional District 27 complies with the compactness standard in article III, 20(b) section of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 10: Admit that Congressional District 28 complies with the compactness standard in article III, 20(b) section of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 11: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 112 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 12: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 113 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 13: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 114

complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 14: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 115 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 15: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 116 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 16: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 118 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 17: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 119 complies with the compactness standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 18: Admit that House District 112 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 19: Admit that House District 113 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 20: Admit that House District 114 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 21: Admit that House District 115 complies with the political-and-

geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 22: Admit that House District 116 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 23: Admit that House District 118 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 24: Admit that House District 119 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 25: Admit that Congressional District 26 complies with the political-and-geographical-boundaries standard in article III, section 20(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 26: Admit that Congressional District 27 complies with the political-and-geographical-boundaries standard in article III, section 20(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 27: Admit that Congressional District 28 complies with the political-and-geographical-boundaries standard in article III, section 20(b) of the Florida Constitution.

Plaintiff objects on the grounds that this request seeks the admission of a pure legal conclusion.

Request No. 28: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 112 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 29: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 113 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 30: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 114 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 31: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 115 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 32: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 116 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 33: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 118 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 34: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), the Florida Supreme Court found that House District 119 complies with the political-and-geographical-boundaries standard in article III, section 21(b) of the Florida Constitution.

Denied.

Request No. 35: Admit that you did not participate in the Florida Supreme Court's proceeding to review state-legislative districts in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022).

Admitted.

Request No. 36: Admit that you did not file a brief or a comment in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022).

Admitted.

Request No. 37: Admit that, in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), you did not make a written submission to the Florida Supreme Court or otherwise communicate to the Court your views on any state-legislative district.

Admitted.

Request No. 38: Admit that you did not request oral argument in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022).

Admitted.

Request No. 39: Admit that the Florida Supreme Court did not hold oral argument in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022).

Admitted.

Request No. 40: Admit that, on February 15, 2022, the Florida Supreme Court issued an order in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022), stating in part as follows: "No party has filed a brief or comment opposing the validity of the joint resolution of apportionment. Therefore, the above case will be submitted to the Court without oral argument."

Admitted.

Dated: February 10, 2025

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