

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 CINDY POLO'S ANSWERS TO DEFENDANT HOUSE OF
REPRESENTATIVES' FIRST REQUEST FOR ADMISSIONS**

Plaintiff Cindy Polo 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

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
dtalley@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*

/s/ Nicholas L.V. Warren

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

Counsel for Plaintiffs