

**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.

**PLAINTIFFS' ANSWERS TO DEFENDANT SECRETARY'S
FIRST REQUESTS FOR ADMISSION**

Plaintiffs answer Defendant Secretary of State's First Requests for Admission, dated March 24, 2025, as follows:

Definitions

1. The "2022 redistricting cycle" refers to September 2021 to April 2022.
2. "Members" and "officers" are defined to include all members, fellows, students, residents, agents, leadership, executives, managers, or any other individuals associated or affiliated with the organization.

Requests for Admission

1. Admit that members or officers of the American Civil Liberties Union of Florida discussed redistricting with members of the state legislature during the 2022 redistricting cycle.
Admitted.
2. Admit that Nicholas Warren discussed redistricting with members of the state legislature during the 2022 redistricting cycle.
Admitted.
3. Admit that members or officers of the American Civil Liberties Union of Florida discussed redistricting with Matthew Isbell during the 2022 redistricting cycle.
Admitted.
4. Admit that Nicholas Warren discussed redistricting with Matthew Isbell during the 2022 redistricting cycle.
Admitted.
5. Admit that members or officers of the American Civil Liberties Union of Florida

encouraged Matthew Isbell to participate in the 2022 redistricting cycle.

Admitted.

6. Admit that Nicholas Warren encouraged Matthew Isbell to participate in the 2022 redistricting cycle.

Admitted.

7. Admit that members of the American Civil Liberties Union of Florida discussed the 2022 redistricting cycle with Barbara Pariente.

Admitted.

8. Admit that Nicholas Warren discussed the 2022 redistricting cycle with Barbara Pariente.

Admitted.

9. Admit that Nicholas Warren drew Plan P000C0046.

Admitted.

10. Admit that Nicholas Warren submitted Plan P000C0046 to the Florida Legislature.

Admitted.

11. Admit that Nicholas Warren drew Plan P000C0047.

Admitted.

12. Admit that Nicholas Warren submitted Plan P000C0047 to the Florida Legislature.

Admitted.

Dated: April 23, 2025

/s/ Caroline A. McNamara

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CERTIFICATE OF SERVICE

I certify that on April 23, 2025, I served the foregoing document by email on counsel for all parties.

/s/ Caroline A. McNamara

Counsel for Plaintiffs