

**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 HOUSE OF REPRESENTATIVES'
THIRD REQUEST FOR ADMISSIONS**

Plaintiffs answer and object to Defendant House of Representatives' Third Request for Admissions, dated June 11, 2025.

GENERAL STATEMENT AND OBJECTIONS

1. Plaintiffs object to the extent that Defendant House of Representatives' definitions and instructions purport to impose obligations different from or additional to the requirements of the Federal Rules of Civil Procedure, or to limit the discretion of answering parties under the Federal Rules of Civil Procedure.

2. Plaintiffs' answers are based on information now known to them and are provided without prejudice to Plaintiffs' right to assert additional objections or to revise, correct, supplement, clarify, or amend their answers, if Plaintiffs discover additional grounds for objections or additional, responsive information.

3. Plaintiffs provide their answers without waiving or intending to waive, and Plaintiffs expressly preserve, all applicable privileges, exemptions, and protections from discovery. In the answers provided below, Plaintiffs have not withheld any responsive information on the basis of privilege.

ANSWERS TO REQUESTS FOR ADMISSION

Request No. 1: Admit that, if unpopulated areas are not disregarded, then the Enacted Congressional Plan splits 17 counties.

Admitted.

Request No. 2: Admit that, if unpopulated areas are not disregarded, then McCartan

Congressional Map A splits 18 counties.

Admitted.

Request No. 3: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B1 splits 19 counties.

Admitted.

Request No. 4: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B2 splits 19 counties.

Admitted.

Request No. 5: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C1 splits 20 counties.

Admitted.

Request No. 6: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C2 splits 20 counties.

Admitted.

Request No. 7: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map D splits 19 counties.

Admitted.

Request No. 8: Admit that, if unpopulated areas are not disregarded, then the Enacted Congressional Plan splits 7 counties across more than two districts.

Admitted.

Request No. 9: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map A splits 7 counties across more than two districts.

Denied.

Request No. 10: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B1 splits 7 counties across more than two districts.

Admitted.

Request No. 11: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B2 splits 7 counties across more than two districts.

Admitted.

Request No. 12: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C1 splits 7 counties across more than two districts.

Denied.

Request No. 13: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C2 splits 7 counties across more than two districts.

Denied.

Request No. 14: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map D splits 7 counties across more than two districts.

Denied.

Request No. 15: Admit that, if unpopulated areas are not disregarded, then the Enacted Congressional Plan contains 31 county splits across all counties.

Denied.

Request No. 16: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map A contains 33 county splits across all counties.

Denied.

Request No. 17: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B1 contains 32 county splits across all counties.

Denied.

Request No. 18: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B2 contains 32 county splits across all counties.

Denied.

Request No. 19: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C1 contains 31 county splits across all counties.

Denied.

Request No. 20: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C2 contains 31 county splits across all counties.

Denied.

Request No. 21: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map D contains 29 county splits across all counties.

Denied.

Request No. 22: Admit that, if unpopulated areas are not disregarded, then the Enacted Congressional Plan splits 16 municipalities.

Admitted.

Request No. 23: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map A splits 22 municipalities.

Admitted.

Request No. 24: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B1 splits 18 municipalities.

Admitted.

Request No. 25: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B2 splits 16 municipalities.

Admitted.

Request No. 26: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C1 splits 19 municipalities.

Admitted.

Request No. 27: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C2 splits 19 municipalities.

Admitted.

Request No. 28: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map D splits 22 municipalities.

Denied.

Request No. 29: Admit that, if unpopulated areas are not disregarded, then the Enacted Congressional Plan splits 4 municipalities across more than two districts.

Admitted.

Request No. 30: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map A splits 2 municipalities across more than two districts.

Admitted.

Request No. 31: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B1 splits 3 municipalities across more than two districts.

Admitted.

Request No. 32: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B2 splits 2 municipalities across more than two districts.

Admitted.

Request No. 33: Admit that, if unpopulated areas are not disregarded, then McCartan

Congressional Map C1 splits 2 municipalities across more than two districts.

Admitted.

Request No. 34: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C2 splits 2 municipalities across more than two districts.

Admitted.

Request No. 35: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map D splits 2 municipalities across more than two districts.

Admitted.

Request No. 36: Admit that, if unpopulated areas are not disregarded, then the Enacted Congressional Plan contains 20 municipality splits across all municipalities.

Admitted.

Request No. 37: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map A contains 24 municipality splits across all municipalities.

Denied.

Request No. 38: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B1 contains 21 municipality splits across all municipalities.

Denied.

Request No. 39: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map B2 contains 18 municipality splits across all municipalities.

Denied.

Request No. 40: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C1 contains 22 municipality splits across all municipalities.

Denied.

Request No. 41: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map C2 contains 22 municipality splits across all municipalities.

Denied.

Request No. 42: Admit that, if unpopulated areas are not disregarded, then McCartan Congressional Map D contains 24 municipality splits across all municipalities.

Denied.

Request No. 43: Admit that, if unpopulated areas are not disregarded, then the Enacted State House Plan splits 5 municipalities.

Denied.

Request No. 44: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map A1 splits 5 municipalities.

Denied.

Request No. 45: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map A2 splits 5 municipalities.

Denied.

Request No. 46: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map B splits 8 municipalities.

Denied.

Request No. 47: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C1 splits 6 municipalities.

Denied.

Request No. 48: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C2 splits 6 municipalities.

Denied.

Request No. 49: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C3 splits 5 municipalities.

Denied.

Request No. 50: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C4 splits 6 municipalities.

Denied.

Request No. 51: Admit that, if unpopulated areas are not disregarded, then the Enacted State House Plan splits 3 municipalities across more than two districts.

Denied.

Request No. 52: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map A1 splits 3 municipalities across more than two districts.

Denied.

Request No. 53: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map A2 splits 3 municipalities across more than two districts.

Denied.

Request No. 54: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map B splits 3 municipalities across more than two districts.

Denied.

Request No. 55: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C1 splits 2 municipalities across more than two districts.

Denied.

Request No. 56: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C2 splits 2 municipalities across more than two districts.

Denied.

Request No. 57: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C3 splits 2 municipalities across more than two districts.

Denied.

Request No. 58: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C4 splits 2 municipalities across more than two districts.

Denied.

Request No. 59: Admit that, if unpopulated areas are not disregarded, then the Enacted State House Plan contains 10 municipality splits across all municipalities.

Denied.

Request No. 60: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map A1 contains 10 municipality splits across all municipalities.

Request No. 61: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map A2 contains 10 municipality splits across all municipalities.

Denied.

Request No. 62: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map B contains 12 municipality splits across all municipalities.

Denied.

Request No. 63: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C1 contains 9 municipality splits across all municipalities.

Denied.

Request No. 64: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C2 contains 9 municipality splits across all municipalities.

Denied.

Request No. 65: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C3 contains 8 municipality splits across all municipalities.

Denied.

Request No. 66: Admit that, if unpopulated areas are not disregarded, then McCartan State House Map C4 contains 9 municipality splits across all municipalities.

Denied.

Request No. 67: Admit that a rectangle is not a bizarre shape.

Denied.

Dated: August 22, 2025

/s/ Nicholas L.V. Warren

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CERTIFICATE OF SERVICE

I certify that I served the foregoing document on counsel for all parties by email on August 22, 2025.

/s/ Nicholas L.V. Warren
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