

**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'
FIFTH REQUEST FOR ADMISSIONS**

Plaintiffs answer and object to Defendant House of Representatives' Fifth Request for Admissions, dated June 18, 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.

DEFINITIONS

For purposes of these requests, population numbers are based on the 2020 Census.

ANSWERS TO REQUESTS FOR ADMISSION

Request No. 1: Admit that Enacted State House District 112 is not comprised of two separate pieces.

Denied.

Request No. 2: Admit that District 8 in McCartan Congressional Map D runs more than 90 miles north-south and at one point narrows to approximately 15.5 miles in width (excluding water areas off the Atlantic coast).

Denied.

Request No. 3: Admit that District 21 in McCartan Congressional Maps B1 and B2 crosses the Kissimmee Basin and extends from the Atlantic Ocean to the northeast corner of Port Charlotte in Charlotte County.

Denied.

Request No. 4: Admit that McCartan State House Map A1 splits the City of Miami among five districts.

Admitted.

Request No. 5: Admit that McCartan State House Map A2 splits the City of Miami among five districts.

Admitted.

Request No. 6: Admit that McCartan State House Map A1 splits the City of Miami into more parts than necessary.

Denied.

Request No. 7: Admit that McCartan State House Map A2 splits the City of Miami into more parts than necessary.

Denied.

Request No. 8: Admit that McCartan State House Map B splits the City of Miami into more parts than necessary.

Denied.

Request No. 9: Admit that McCartan State House Map C1 splits the City of Miami into more parts than necessary.

Denied.

Request No. 10: Admit that McCartan State House Map C2 splits the City of Miami into more parts than necessary.

Denied.

Request No. 11: Admit that McCartan State House Map C3 splits the City of Miami into

more parts than necessary.

Denied.

Request No. 12: Admit that McCartan State House Map C4 splits the City of Miami into more parts than necessary.

Denied.

Request No. 13: Admit that the boundaries of Enacted State House District 112 follow, in part, major roadways such as the Palmetto Expressway, the Dolphin Expressway, and the Tamiami Trail (State Road 41); municipal boundaries of Hialeah, Doral, Hialeah Gardens, and Medley; and the Little River Canal and the North Fork of the Miami River.

Admitted.

Request No. 14: Admit that two municipalities—Miami Springs and Virginia Gardens—are kept whole within Enacted State House District 112.

Admitted.

Request No. 15: Admit that the only municipalities that Enacted State House District 112 splits are the Cities of Miami and Hialeah, which, according to the 2020 decennial census, have populations of 442,241 and 223,109 people, respectively.

Admitted.

Request No. 16: Admit that the boundaries of Enacted State House District 113 follow, in part, major roadways such as the Tamiami Trail (State Road 41), Coral Way (Southwest 22nd Street), and Biscayne Boulevard (U.S. Highway 1); municipal boundaries of the Cities of Miami, Coral Gables, and Miami Beach; and the Miami River and PortMiami's Main Channel.

Admitted.

Request No. 17: Admit that the Village of Key Biscayne is kept whole within Enacted State House District 113.

Admitted.

Request No. 18: Admit that the only municipality that Enacted State House District 113 splits is the City of Miami, which, according to the 2020 decennial census, has a population of 442,241 people.

Admitted.

Request No. 19: Admit that the boundaries of Enacted State House District 114 follow, in part, major roadways such as the Dolphin Expressway and the Tamiami Trail (State Road 41);

municipal boundaries of West Miami, South Miami, Coral Gables, Pinecrest, and Palmetto Bay; the Snapper Creek Canal; and the coastline along Biscayne Bay.

Admitted.

Request No. 20: Admit that three municipalities—West Miami, South Miami, and Coral Gables—are kept whole within Enacted State House District 114.

Admitted.

Request No. 21: Admit that the only municipality that Enacted State House District 114 splits is the City of Miami, which, according to the 2020 decennial census, has a population of 442,241 people.

Admitted.

Request No. 22: Admit that the boundaries of Enacted State House District 115 follow, in part, major roadways such as the Tamiami Trail (State Road 41), Kendall Drive (State Road 94), Galloway Road (87th Avenue), the Don Shula Expressway, and U.S. Highway 1; municipal boundaries of the Cities of Miami, West Miami, South Miami, and Coral Gables, the Villages of Pinecrest and Palmetto Bay, and the Town of Cutler Bay; the Cutler Drain Canal and the Black Creek Canal; and the coastline along Biscayne Bay.

Admitted.

Request No. 23: Admit that three municipalities—Pinecrest, Palmetto Bay, and Cutler Bay—are kept whole within Enacted State House District 115.

Admitted.

Request No. 24: Admit that Enacted State House District 115 does not split any municipalities.

Admitted.

Request No. 25: Admit that the boundaries of Enacted State House District 116 follow, in part, major roadways such as the Dolphin Expressway, the Florida Turnpike, the Don Shula Expressway, Kendall Drive (State Road 94), and Galloway Road (87th Avenue); and municipal boundaries of Doral and Sweetwater.

Admitted.

Request No. 26: Admit that the City of Sweetwater is kept whole within Enacted State House District 116.

Admitted.

Request No. 27: Admit that Enacted State House District 116 does not split any municipalities.

Admitted.

Request No. 28: Admit that the boundaries of Enacted State House District 118 follow, in part, major roadways such as the Tamiami Trail (State Road 41) and the Florida Turnpike, as well as the CSX rail line.

Admitted.

Request No. 29: Admit that Enacted State House District 118 does not split any municipalities.

Admitted.

Request No. 30: Admit that the boundaries of Enacted State House District 119 follow, in part, major roadways such as the Tamiami Trail (State Road 41) and Krome Avenue (State Road 997), as well as the CSX rail line.

Admitted.

Request No. 31: Admit that Enacted State House District 119 does not split any municipalities.

Admitted.

Request No. 32: Admit that, along its northern boundary, Enacted Congressional District 26 follows county boundaries for approximately 120 miles, from Interstate 75 in Collier County to the municipal boundary of Miami Gardens in Miami-Dade County.

Admitted.

Request No. 33: Admit that Enacted Congressional District 26's northern boundary departs from county boundaries only in and around Immokalee, where the district's boundary follows State Roads 82 and 29 and County Road 846 for approximately 21 miles.

Admitted.

Request No. 34: Admit that, along its western and southern boundaries, Enacted Congressional District 26 follows, in part, major roadways such as Interstate 75, Collier Boulevard (County Road 951), and Tamiami Trail (State Road 41); the boundary between Collier and Monroe Counties; and municipal boundaries of Bonita Springs and Marco Island.

Admitted.

Request No. 35: Admit that, along its eastern boundary, Enacted Congressional District

26 follows, in part, major roadways such as the Dolphin Expressway, the Airport Expressway, and the Palmetto Expressway and municipal boundaries of the Cities of Miramar, Miami Gardens, Hialeah, Opa-Locka, Miami, Doral, and Sweetwater and the Town of Miami Lakes.

Admitted.

Request No. 36: Admit that seven municipalities—Miami Lakes, Hialeah, Hialeah Gardens, Medley, Doral, Miami Springs, and Virginia Gardens—are kept whole within Enacted Congressional District 26.

Admitted.

Request No. 37: Admit that the western boundaries of Enacted Congressional Districts 20 and 21 and the northern boundary of Enacted Congressional District 21 adhere to the entire western boundaries of Broward, Palm Beach, Martin, and St. Lucie Counties and the entire northern boundary of St. Lucie County for nearly 140 consecutive miles.

Admitted.

Request No. 38: Admit that 91.9 percent of the total population of Enacted State House District 113 (167,896 of 182,742 people) resides in the City of Miami.

Admitted.

Request No. 39: Admit that, according to the 2020 decennial census, 51,425 people reside in the portion of Enacted House District 112 that lies south of Northwest 36th Street and east of State Road 953 (LeJeune Road).

Admitted.

Request No. 40: Admit that, according to the 2020 decennial census, approximately 51,000 people reside in the portion of Enacted House District 112 that lies south of Northwest 36th Street and east of State Road 953 (LeJeune Road).

Admitted.

Request No. 41: Admit that, according to the 2020 decennial census, 37,999 people reside in the portion of Enacted House District 112 that lies south of the Dolphin Expressway and east of State Road 953 (LeJeune Road).

Admitted.

Request No. 42: Admit that, according to the 2020 decennial census, approximately 38,000 people reside in the portion of Enacted House District 112 that lies south of the Dolphin Expressway and east of State Road 953 (LeJeune Road).

Admitted.

Request No. 43: Admit that, according to the 2020 decennial census, 24,156 people reside in the southern portion of the City of Miami that lies within Enacted State House District 114.

Admitted.

Request No. 44: Admit that, according to the 2020 decennial census, 47,800 people reside in the northern portion of the City of Miami that lies within Enacted State House District 114.

Admitted.

Request No. 45: Admit that District 114 in McCartan State House Map A1 encompasses two separate pieces of the City of Miami.

Admitted.

Request No. 46: Admit that District 114 in McCartan State House Map A2 encompasses two separate pieces of the City of Miami.

Admitted.

Request No. 47: Admit that, during the 2021–22 redistricting process, legislative staff submitted five State House redistricting plans: H000H8005, H000H8007, H000H8009, H000H8011, and H000H8013.

Admitted.

Request No. 48: Admit that, during the 2021–22 redistricting process, no Democratic member of the Florida Legislature submitted a State House redistricting plan, filed a bill that contained a State House redistricting plan, or filed an amendment to a bill that contained a State House redistricting plan.

Admitted.

Dated: August 22, 2025

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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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