

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

KÉTO NORD HODGES, *et al.*,

Plaintiffs,

v.

Case No. 8:24-cv-879-CEH-TPB-ALB

KATHLEEN PASSIDOMO, *etc., et al.*,

Defendants.

_____ /

PLAINTIFFS' RULE 26 INITIAL DISCLOSURES

Plaintiffs provide these initial disclosures pursuant to Federal Rule of Civil Procedure 26(a).

I. Individuals Likely to Have Discoverable Information

- A. Plaintiffs **Kéto Nord Hodges, Meiko Seymour, Jarvis El-Amin, Jennifer Garcia,** and **Jacqueline Azis.** They have information tending to show that the Challenged Districts cause harm to themselves and other residents, and information relating to whether the Challenged Districts are narrowly tailored to a compelling state interest. They can be contacted through undersigned counsel.
- B. Members and staff of the Florida Senate during the Challenged Districts' enactment. Each individual may have information regarding the legislative redistricting process, the drawing of districts, the consideration of race and other factors, and the tailoring of race to a compelling state interest.
- a. **Wilton Simpson**, Department of Agriculture & Consumer Services, The Capitol, Tallahassee, FL 32399, (800) 435-7352

- b. **Ray Rodrigues**, State University System of Florida, 325 W Gaines St, Suite 1614, Tallahassee, FL 32399, (850) 245-0466
- c. **Doug Broxson**, 202 Senate Building, 404 S Monroe St, Tallahassee, FL 32399-1100, (850) 487-5001
- d. **Aaron Bean**, 1239 Longworth House Office Building, Washington, DC 20515, (202) 225-0123
- e. **Randolph Bracy**, 1310 Foltz Loop, Oakland, FL 34787
- f. **Jennifer Bradley**, 408 Senate Building, 404 S Monroe St, Tallahassee, FL 32399-1100, (850) 487-5006
- g. **Danny Burgess**, 410 Senate Building, 404 S Monroe St, Tallahassee, FL 32399-1100, (850) 487-5023
- h. **Audrey Gibson**, address unknown
- i. **Gayle Harrell**, 411 Senate Building, 404 S Monroe St, Tallahassee, FL 32399-1100, (850) 487-5031
- j. **Ana Maria Rodriguez**, 309 Senate Building, 404 S Monroe St, Tallahassee, FL 32399-1100, (850) 487-5040
- k. **Darryl Rouson**, 212 Senate Building, 404 S Monroe St, Tallahassee, FL 32399-1100, (850) 487-5016
- l. **Kelli Stargel**, address unknown
- m. **Linda Stewart**, 205 Senate Building, 404 S Monroe St, Tallahassee, FL 32399-1100, (850) 487-5017
- n. **Jason Rojas**, 4037 Shady View Ln, Tallahassee, FL 32311-3303, 850-322-6103
- o. **Jay Ferrin**, 409 The Capitol, 404 S Monroe St, Tallahassee, FL 32399, (850) 487-5229
- p. **Gary Farmer**, 17th Judicial Circuit Court, 201 SE 6th Street, Ft Lauderdale, Fl. 33301, (954) 831-7870
- q. **Shevrin Jones**, 218 Senate Building, 404 S Monroe St, Tallahassee, FL 32399-1100, (850) 487-5034

r. **Annette Taddeo**, 1742 W Flagler St, Miami, FL 33135

C. Members of the Florida House of Representatives during the Challenged Districts' enactment. Each individual may have information regarding the legislative redistricting process, the drawing of districts, the consideration of race and other factors, and the tailoring of race to a compelling state interest.

- a. **Cord Byrd**, Legislative Redistricting Subcommittee chair, R.A. Gray Building, 500 S Bronough St, Tallahassee, FL 32399-0250, (850) 245-6500
- b. **Will Robinson**, Legislative Redistricting Subcommittee vice chair, 417 House Office Building, 402 S Monroe St, Tallahassee, FL 32399-1300, (850) 717-5071
- c. **Dan Daley**, Legislative Redistricting Subcommittee ranking member, 407 House Office Building, 402 S Monroe St, Tallahassee, FL 32399-1300, (850) 717-5096
- d. **Tom Leek**, Redistricting Committee chair, 418 The Capitol, 402 S Monroe St, Tallahassee, FL 32399-1300, (850) 717-5028
- e. **Randy Fine**, Redistricting Committee vice chair, 214 House Office Building, 402 S Monroe St, Tallahassee, FL 32399-1300, (850) 717-5033
- f. **Joseph Geller**, Redistricting Committee ranking member, 200 E Broward Blvd, Ste 1800, Fort Lauderdale, FL 33301-1963, (954) 491-1120
- g. **Fentrice Driskell**, Redistricting Committee member, 316 The Capitol, 402 S Monroe St, Tallahassee, FL 32399, (850) 717-5067
- h. **Geraldine Thompson**, Redistricting Committee member, 213 Senate Building, 404 S Monroe St, Tallahassee, FL 32399-1100, (850) 487-5015
- i. **Dotie Joseph**, Redistricting Committee member, 407 House Office Building, 402 S Monroe St, Tallahassee, FL 32399-1300, (850) 717-5108
- j. **Andrew Learned**, State Representative, address unknown
- k. **Ben Diamond**, State Representative, 150 2nd Ave N, Suite 570 St. Petersburg, FL 33701, 727-823-1400
- l. **Michele Rayner**, State Representative, 1302 The Capitol, 402 S Monroe St,

Tallahassee, FL 32399-1300, (850) 717-5062

m. **Tracie Davis**, State Representative, 224 Senate Building, 404 S Monroe St, Tallahassee, FL 32399-1100, (850) 487-5005

D. The following may have information relating to whether the Challenged Districts are narrowly tailored to a compelling state interest:

- a. **Arthenia Joyner**, 1234 E 5th Ave, Tampa, FL 33605-4904, (813) 273-0017
- b. **Lesley J. Miller Jr.**, 2505 E 38th Ave, Tampa, FL 33610, (406) 786-7380
- c. **Gwen Myers**, 601 E Kennedy Blvd, Tampa, FL 33602, (813) 272-5720
- d. **Pat Kemp**, 601 E Kennedy Blvd, Tampa, FL 33602, (813) 272-5730
- e. **Sean Shaw**, 1234 E 5th Ave Tampa, FL 33605-4904, (813) 273-0017
- f. **René Flowers**, 315 Court St, Clearwater, FL 33756, (727) 464-3614
- g. **Yvette Lewis**, 5101 N 40th St, Ste B, Tampa, FL 33610, (813) 234-8683
- h. **Esther Matthews**, PO Box 35123, St. Petersburg, FL 33705, (727) 657-9975
- i. **Matt Caldwell**, address unknown
- j. **Jeff Clemens**, address unknown
- k. **Oscar Braynon**, address unknown
- l. **Betty Parker**, address unknown
- m. **Joe Brown**, address unknown
- n. **Mary Ellen Klas**, address unknown, (850) 524-4488
- o. **Jim Rosica**, address unknown
- p. **Brandon Larrabee**, address unknown
- q. **Romy Ellenbogen**, address unknown

E. The following, or a corporate representative of their office, have information relating to the administration of Senate elections and implementation of Senate

district maps:

- a. **Secretary of State Cord Byrd**, c/o counsel for Secretary of State
- b. **Pinellas County Supervisor of Elections Julie Marcus**, 13001 Starkey Road, Largo, FL 33773, (727) 464-8683
- c. **Hillsborough County Supervisor of Elections Craig Latimer**, 601 E. Kennedy Blvd, 16th Floor, Tampa, FL 33602, (813) 272-5850
- d. **Pasco County Supervisor of Elections Brian Corley**, PO Box 300, Dade City, FL 33526, (800) 851-8754

F. Any persons listed on Defendants' initial disclosures.

II. Descriptions of Documents

- A. Maps included in the Complaint
- B. News articles cited in the Complaint
- C. Transcripts of legislative committee meetings and sessions during the 2021–22 redistricting process
- D. Documents and data related to redistricting posted publicly on flsenate.gov or floridaredistricting.gov.

III. Computation of Damages. N/A.

IV. Insurance Agreements. N/A.

Plaintiffs reserve the right to supplement these initial disclosures pursuant to FRCP 26(e).

Dated May 31, 2024.

/s/ Caroline A. McNamara

Nicholas L.V. Warren (FBN 1019018)
ACLU Foundation of Florida
1809 Art Museum Drive, Suite 203
Jacksonville, FL 32207
(786) 363-1769
nwarren@aclufl.org

Daniel B. Tilley (FBN 102882)
Caroline A. McNamara (FBN 1038312)
ACLU Foundation of Florida
4343 West Flagler Street, Suite 400
Miami, FL 33134
(786) 363-2714
dtalley@aclufl.org
cmcnamara@aclufl.org

* *Special admission*

Deborah N. Archer*
David Chen*
Civil Rights & Racial Justice Clinic
Washington Square Legal Services, Inc.
245 Sullivan Street
New York, NY 10012
(212) 998-6473
deborah.archer@nyu.edu
davidchen@nyu.edu

James Michael Shaw, Jr. (FBN 677851)
Naomi Robertson (FBN 1032076)
Butler Weihmuller Katz Craig LLP
400 North Ashley Drive, Suite 2300
Tampa, FL 33602
(813) 281-1900
jshaw@butler.legal
nrobertson@butler.legal

Counsel for Plaintiffs