

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

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

Defendants.

PLAINTIFFS' ANSWERS AND OBJECTIONS TO
PRESIDENT PASSIDOMO'S FIRST SET OF INTERROGATORIES TO KÉTO
NORD HODGES

Plaintiff Kéto Nord Hodges respond and object to the Senate President Kathleen Passidomo's First Set of Interrogatories to Kéto Nord Hodges, as follows:

1. **Please provide a detailed list of each of your residential addresses from January 2011 through the present day, and indicate the dates you lived at each listed address.**
 - June 2019 – present: 10907 N. Hyacinth Ave, Tampa, FL
 - 2017 – June 2019: 7349 Abonado Rd., Tampa, FL
 - May 2016 – 2017: 4714 Stonepointe Pl., Tampa, FL
 - May 2015 – May 2016: 9406 Bramble Ct., Tampa, FL
 - Oct. 2012 – May 2015 9410 North Blvd., Tampa, FL
 - Nov. 2011 – Oct. 2012: 2218 Lee Ct., Apt. 104, Tampa, FL
 - 2008 – Nov. 2011: 5408 Fieldstone Dr., Lakeland, FL
2. **Regarding Paragraph 11 of the Complaint, explain in detail the factual basis for your claim that the Enacted Plan “sacrificed genuine communities of interest.”**

Plaintiff objects to this interrogatory as a premature contention interrogatory because (1) discovery is in its infancy and Plaintiff has not gathered all evidence that will be used to support his claims, (2) nor has he received information from Defendants that may also be used to support his claims, and (3) the request seeks a detailed explanation of a substantial part of his case before deposition discovery. Accordingly, requiring Plaintiff to answer this interrogatory will result in a waste

of time and resources. With the benefit of full discovery, Plaintiff may be able to provide a meaningful response to this interrogatory.

Plaintiff also objects to this interrogatory as overly broad, unduly burdensome, and oppressive, since it (together with the seven other contention interrogatories in this set) seeks a detailed narrative account of his case.

Plaintiff further objects because this, and the other contention interrogatories in this set, are neither used sparingly nor designed to target claims or contentions that Defendant reasonably suspects may be the proper subject of early dismissal or resolution; nor are they designed to identify and narrow the scope of unclear claims and contentions.

3. Regarding Paragraph 12 of the Complaint, explain in detail the factual basis for your claim that the Enacted Plan reduced Black voters' influence in District 18.

Plaintiff objects to this interrogatory as a premature contention interrogatory because (1) discovery is in its infancy and Plaintiff has not gathered all evidence that will be used to support his claims, (2) nor has he received information from Defendants that may also be used to support his claims, and (3) the request seeks a detailed explanation of a substantial part of his case before deposition discovery. Accordingly, requiring Plaintiff to answer this interrogatory will result in a waste of time and resources. With the benefit of full discovery, Plaintiff may be able to provide a meaningful response to this interrogatory.

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4. Regarding Paragraph 13 of the Complaint, explain in detail the factual basis for your claim that "Floridians . . . called out and questioned" the Legislature, only to have their concerns "dismissed by the Legislature as a whole."

Plaintiff objects to this interrogatory as a premature contention interrogatory because (1) discovery is in its infancy and Plaintiff has not gathered all evidence that will be used to support his claims, (2) nor has he received information from Defendants that may also be used to support his claims, and (3) the request seeks a

detailed explanation of a substantial part of his case before deposition discovery. Accordingly, requiring Plaintiff to answer this interrogatory will result in a waste of time and resources. With the benefit of full discovery, Plaintiff may be able to provide a meaningful response to this interrogatory.

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5. Regarding Paragraph 20 and 23 of the Complaint, explain in detail your allegations that the Enacted Plan “split up [your] community” and “group[ed] [your] community[] with dissimilar ones unnecessarily, simply because of [your] race.”

Plaintiff objects to this interrogatory as a premature contention interrogatory because (1) discovery is in its infancy and Plaintiff has not gathered all evidence that will be used to support his claims, (2) nor has he received information from Defendants that may also be used to support his claims, and (3) the request seeks a detailed explanation of a substantial part of his case before deposition discovery. Accordingly, requiring Plaintiff to answer this interrogatory will result in a waste of time and resources. With the benefit of full discovery, Plaintiff may be able to provide a meaningful response to this interrogatory.

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6. Regarding Paragraphs 6, 7, 93, 96, and 136 of the Complaint, explain in detail your claims that the Legislature “elevated race above all other considerations,” that the Legislature drew the Enacted Plan in a “race-predominant” manner, that racial aims were “the Legislature’s predominant goal,” that race was the

“central consideration in mapmaking,” and that “[r]ace predominated over all other redistricting criteria.”

Plaintiff objects to this interrogatory as a premature contention interrogatory because (1) discovery is in its infancy and Plaintiff has not gathered all evidence that will be used to support his claims, (2) nor has he received information from Defendants that may also be used to support his claims, and (3) the request seeks a detailed explanation of a substantial part of his case before deposition discovery. Accordingly, requiring Plaintiff to answer this interrogatory will result in a waste of time and resources. With the benefit of full discovery, Plaintiff may be able to provide a meaningful response to this interrogatory.

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7. Regarding Paragraph 97 of the Complaint, describe in detail the “direct evidence of racial predominance” to which the paragraph references.

Plaintiff objects to this interrogatory as a premature contention interrogatory because (1) discovery is in its infancy and Plaintiff has not gathered all evidence that will be used to support his claims, (2) nor has he received information from Defendants that may also be used to support his claims, and (3) the request seeks a detailed explanation of a substantial part of his case before deposition discovery. Accordingly, requiring Plaintiff to answer this interrogatory will result in a waste of time and resources. With the benefit of full discovery, Plaintiff may be able to provide a meaningful response to this interrogatory.

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- 8. Regarding Paragraph 95 of the Complaint, list the traditional, race-neutral redistricting criteria you allege the Enacted Plan “ignores” or “subordinate[s],” and explain in detail the factual basis for your claim regarding each criterion.**

Plaintiff objects to this interrogatory as a premature contention interrogatory because (1) discovery is in its infancy and Plaintiff has not gathered all evidence that will be used to support his claims, (2) nor has he received information from Defendants that may also be used to support his claims, and (3) the request seeks a detailed explanation of a substantial part of his case before deposition discovery. Accordingly, requiring Plaintiff to answer this interrogatory will result in a waste of time and resources. With the benefit of full discovery, Plaintiff may be able to provide a meaningful response to this interrogatory.

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- 9. Regarding Paragraph 131 of the Complaint, explain in detail the factual basis for your claim that “[t]he Legislature lacked good reasons to believe that the Enacted Plan was necessary to achieve Tier One compliance.”**

Plaintiff objects to this interrogatory as a premature contention interrogatory because (1) discovery is in its infancy and Plaintiff has not gathered all evidence that will be used to support his claims, (2) nor has he received information from Defendants that may also be used to support his claims, and (3) the request seeks a detailed explanation of a substantial part of his case before deposition discovery. Accordingly, requiring Plaintiff to answer this interrogatory will result in a waste of time and resources. With the benefit of full discovery, Plaintiff may be able to provide a meaningful response to this interrogatory.

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resolution; nor are they designed to identify and narrow the scope of unclear claims and contentions.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on 7-31-2024

Kéto Nord Hodges
Kéto Nord Hodges

Dated August 2, 2024.

/s/ Caroline A. McNamara

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