

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
MEIKO SEYMOUR

Plaintiff Meiko Seymour respond and object to the Senate President Kathleen Passidomo's First Set of Interrogatories to Meiko Seymour, 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.**

- July 2022 – present: 824 10th Ave South, Saint Petersburg FL

Plaintiff Seymour objects to providing prior residential address history on the grounds that the request is not sufficiently limited in time so as to be unwarrantedly annoying and oppressive and is not relevant to any party's claim or defense, since a plaintiffs' residential history in the past is not relevant to whether they have standing to challenge a district today

- 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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

- 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.

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.

- 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.


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.

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

Executed on August 2nd, 2024



Meiko Seymour

Dated August 2, 2024.

/s/ Daniel B. Tilley

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