

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

BLACK VOTERS MATTER CAPACITY
BUILDING INSTITUTE, INC., EQUAL
GROUND EDUCATION FUND, INC.,
LEAGUE OF WOMEN VOTERS OF
FLORIDA, INC., LEAGUE OF WOMEN
VOTERS OF FLORIDA EDUCATION
FUND, INC., FLORIDA RISING
TOGETHER, PASTOR REGINALD
GUNDY, SYLVIA YOUNG, PHYLLIS
WILEY, ANDREA HERSHORIN,
ANAYDIA CONNOLLY, BRANDON P.
NELSON, KATIE YARROWS, CYNTHIA
LIPPERT, KISHA LINEBAUGH, BEATRIZ
ALONSO, GONZALO ALFREDO
PEDROSO, and ILEANA CABAN,

Plaintiffs,

v.

CORD BYRD, in his official capacity as
Florida Secretary of State, ASHLEY MOODY,
in her official capacity as Florida Attorney
General, the FLORIDA SENATE, and the
FLORIDA HOUSE OF
REPRESENTATIVES,

Defendants.

Case No. 2022-ca-000666

**PLAINTIFFS' NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM
WITHOUT DEPOSITION ON NON-PARTIES**

YOU ARE HEREBY notified that after ten (10) days from the date of service of this notice, if no objections are served by any party, undersigned counsel for Plaintiffs Black Voters Matter Capacity Building Institute, Inc., Equal Ground Education Fund, Inc., League of Women Voters of Florida, Inc., League of Women Voters of Florida Education Fund, Inc., Florida Rising Together, Pastor Reginald Gundy, Sylvia Young, Phyllis Wiley, Andrea Hershorin, Anaydia

Connolly, Brandon Nelson, Katie Yarrows, Cynthia Lippert, Kisha Linebaugh, Beatriz Alonso, Gonzalo Alfredo Pedroso, and Ileana Caban, will issue the attached Subpoena Duces Tecum Without Deposition pursuant to Florida Rule of Civil Procedure 1.351 upon the **Executive Office of Governor Ron DeSantis** and **Governor Ron DeSantis**. The materials received pursuant to the attached Subpoena will be used for discovery, at trial, and for such other purposes as are permitted under the applicable Florida Statutes and Florida Rules of Civil Procedure.

Dated: July 26, 2022

/s/ Frederick S. Wermuth

Frederick S. Wermuth

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Counsel for Plaintiffs

***Admitted pro hac vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 26, 2022 I electronically filed the foregoing using the State of Florida ePortal Filing System, which will serve an electronic copy to counsel in the Service List below.

/s/ Frederick S. Wermuth
Frederick S. Wermuth
Florida Bar No. 0184111

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Case No. 2022-ca-000666

**SUBPOENA DUCES TECUM FOR PRODUCTION OF DOCUMENTS WITHOUT
DEPOSITION PURSUANT TO FLA. R. CIV. P. 1.351**

THE STATE OF FLORIDA:

To: Governor Ron DeSantis, personally and in his official capacity
Executive Office of Governor Ron DeSantis
400 S Monroe St., Suite 209, Tallahassee, FL 32399

YOU ARE COMMANDED to appear at the offices of Phipps Reporting, 2894 Remington Green Lane, Suite A, Tallahassee, FL 32308 on **August 19, 2022 at 10:00 a.m.** and have with you at that time and place the following:

SEE ATTACHED SCHEDULE A

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of these items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. ****IF THE COST OF PRODUCING THE REQUESTED DOCUMENTS WILL EXCEED \$100.00, PLEASE CONTACT THOMAS A. ZEHNDER, 25 EAST PINE STREET, ORLANDO, FL 32801, TELEPHONE: (407) 422-2472, FOR FURTHER INSTRUCTIONS BEFORE INCURRING THE COST OF PRODUCING THE REQUESTED DOCUMENTS.**

You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE GIVEN.**

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

Dated: _____

By: /s/ Frederick S. Wermuth
Frederick S. Wermuth
FOR THE COURT

Subpoena issued by:
Frederick S. Wermuth
Florida Bar No. 0184111
KING, BLACKWELL, ZEHNDER & WERMUTH, P.A.
P.O. Box 1631
Orlando, Florida 32802
Telephone: (407) 422-2472
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Counsel for Plaintiffs

IF YOU ARE A PERSON WITH A DISABILITY WHO NEEDS ANY ACCOMMODATIONS IN ORDER TO PARTICIPATE IN THIS PROCEEDING, YOU ARE ENTITLED, AT NO COST TO YOU, TO THE PROVISION OF CERTAIN ASSISTANCE. PLEASE CONTACT THE ADA COORDINATOR, HUMAN RESOURCES, ORANGE COUNTY COURTHOUSE, 425 N. ORANGE AVE., SUITE 510, ORLANDO, FLORIDA (407) 836-2303, AT LEAST 7 DAYS BEFORE YOUR SCHEDULED COURT APPEARANCE, OR IMMEDIATELY UPON RECEIVING THIS COURT NOTIFICATION. IF THE TIME BEFORE THE SCHEDULED APPEARANCE IS LESS THAN 7 DAYS, OR IF YOU ARE HEARING OR VOICE IMPAIRED, CALL 711.

SCHEDULE A

DEFINITIONS AND INSTRUCTIONS

- A. Notwithstanding any definition set forth below, each word, term, or phrase used in these requests is intended to have the broadest meaning permitted under the Florida Rules of Civil Procedure.
- B. Words or terms not specifically defined herein have the meaning commonly understood, and no definition is intended as exclusive.
- C. The following terms shall have the meanings indicated below:
- (1) The terms “you,” and “your” shall mean Governor Ron DeSantis, in his capacity as an individual and as Governor of Florida, and covers the Executive Office of Governor Ron DeSantis as well as present and former agents, assigns, employees, partners, successors, predecessors, associates, personnel, staff, officers, representatives, attorneys, and other persons or entities acting or purporting to act on behalf of Governor Ron DeSantis or the Executive Office of Governor Ron DeSantis.
 - (2) The term “Legislature” shall mean the Florida Legislature, including but not limited to the Florida House of Representatives, the Florida Senate, the Florida Senate Committee on Reapportionment, the Florida Senate Select Subcommittee on Congressional Reapportionment, the Florida Senate Select Subcommittee on Legislative Reapportionment, the Florida House Congressional Redistricting Committee, the Florida House Congressional Redistricting Subcommittee, the Florida House State Legislative Redistricting Subcommittee, and their respective members and staff.
 - (3) The term “Fair Districts Amendments” shall mean Article III, Sections 20 and 21 of the Florida Constitution.
 - (4) The term “Enacted Plan” shall mean the congressional district plan passed by the Legislature on April 21, 2022, or any drafts or precursors thereof.
 - (5) The term “Plan P000C0079” shall mean the congressional district plan submitted to the Legislature on January 16, 2022 by Ryan Newman, Counsel to the Governor, or any drafts or precursors thereof.
 - (6) The term “Plan P000C0094” shall mean the congressional district plan submitted to the Legislature on February 14, 2022 by Ryan Newman, Counsel to the Governor, or any drafts or precursors thereof.
 - (7) The term “Plan H000C8019” shall mean the congressional district plan approved by the Legislature on March 4, 2022, or any drafts or precursors thereof.

- (8) The term “Plan H000C8015” shall mean the congressional district plan approved by the Legislature on March 4, 2022, with the recommendation that the plan take effect if the Plan H000C8019 was found unconstitutional.
- (9) The term “Proposed Plans” shall mean all congressional redistricting plans drawn, considered, reviewed, proposed, or adopted by you or the Legislature during 2022, as well as any drafts or precursors of those plans or subsequent amendments thereof.
- (10) The term “map drawer” shall mean anyone who assisted, advised, or provided input or feedback in the creation of any Proposed Plan, regardless of whether or not they were compensated for their services or participated in an official or unofficial capacity.
- (11) The term “mapping software” means any and all digital programs that may be used to assist in drawing congressional districts.
- (12) The term “person” shall mean and include natural persons, governmental entities, proprietorships, corporations, partnerships, joint ventures, and each other form of organization, entity or association.
- (13) The term “document” is used in the broadest possible sense and shall mean, without limitation, any tangible thing on or in which data are preserved by any means or in any form, including, without limiting the generality of its meaning, electronically stored information (ESI) or recorded material of any kind such as email or other electronic correspondence, including any electronic or computerized record from which information can be obtained or translated, correspondence, letters, envelopes, telegrams, facsimiles, telexes, text messages, minutes, notes or memoranda of personal or telephone conversations or conferences, telephone logs, memoranda, handwritten or stenographic notes, diaries, calendars, contracts, purchase orders, invoices, accounts, ledgers, evaluations, analyses, forecasts, statistics, estimates, reviews, working papers, reports, studies, books, magazines, newspapers, booklets, brochures, catalogs, pamphlets, instructions, circulars, bulletins, trade letters, press releases, charts, maps, geological or geophysical logs, diagrams, designs, specifications, blueprints, sketches, drawings, pictures, photographs, motion pictures, negatives, undeveloped film, video or audio tapes, belts or discs, voice recordings, transcripts or transcriptions, computer printouts, magnetically encoded cards or tapes, punched cards or tapes, microfilms, microfiches, and any other data compilations from which words, numbers, images or other information can be obtained (translated, if necessary, through appropriate devices into reasonably useable form), whether or not privileged, that is in your possession, custody or control, and shall include all originals, drafts and non-identical copies of such documents, whether sent or received or neither.
- (14) The term “communication” shall mean the transmission of any verbal or nonverbal, written or non-written message, information, sign, symbol, or behavior, and shall include the process by which such transmission occurs.

- (15) The terms “relating to” and “concerning” shall mean referring to, related to, regarding, consisting of, pertaining to, reflecting, evidencing, describing, constituting, or being in any way logically or factually connected with the matter discussed, including any connection, direct or indirect, whatsoever with the requested topic, without limitation, unless otherwise specified in the Request.
- D. Notwithstanding any of the provisions below, Respondents should not produce any documents or communications that are currently publicly available on the Legislature’s or the Governor’s official websites.
- E. Unless otherwise specified, the time period for all documents or communications requested is January 1, 2021 to the present day.
- F. The following rules of construction apply to all requests for production:
- a. The terms “all” and “any” shall each be construed as encompassing any and all;
 - b. All uses of the word “each” include “every” (and vice versa);
 - c. The connective terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the requests all responses that might otherwise be construed to be outside of its scope, so that the fullest disclosure of information, documents, and communications is achieved;
 - d. The term “including” shall be construed without limitation;
 - e. The use of a verb in any tense encompasses the use of the verb in all tenses;
 - f. References to agents, assigns, employees, partners, successors, predecessors, associates, personnel, staff, officers, agents, representatives, attorneys, and other persons or entities acting or purporting to act on your behalf include both current and former agents, assigns, employees, partners, successors, predecessors, associates, personnel, staff, officers, agents, representatives, attorneys, and other persons or entities acting or purporting to act on your behalf; and
 - g. References to any entity include all of that entity’s agents, assigns, employees, partners, successors, predecessors, associates, personnel, staff, officers, agents, representatives, attorneys, and other persons or entities acting or purporting to act on that entities’ behalf.
 - h. The singular number and masculine gender shall include, and be applied as, the plural or the feminine gender or neuter, and vice-versa, as the circumstances of the particular requests may make appropriate.
- G. Each request for documents or communications shall be construed according to its most inclusive meaning so that if information, a document, or a communication is responsive to

any reasonable interpretation of the request, the information, document, or communication is responsive.

H. If you deem any request for documents or communications to call for the production of privileged or otherwise nondisclosable materials and you assert such claim, furnish a list at the time of production identifying each document or communication so withheld together with the following information:

- (1) the reason for withholding each such document, communication, or material, stated with sufficient particularity so as to permit the Court to adjudicate the validity of the claimed privilege;
- (2) a statement of the facts constituting the basis for any claim of privilege or other ground of non-disclosure; and
- (3) a brief description of each such document, communication, or other material, including:
 - (a) the type of document or communication;
 - (b) the date of the document or communication;
 - (c) the name of its author(s) or preparer(s) and an identification by employment and title of each such person(s);
 - (d) the name of each person to whom the document, communication, or other material was sent or who has had access to, or custody of, the document, communication, or other material, together with an identification of each such person(s);
 - (e) the subject matter of the document or communication;
 - (d) the paragraph of this request to which the document, communication, or other material is responsive; and
 - (e) in the case of any document, communication, or other material that relates in any way to a meeting or conversation, identification of such meeting or conversation and the persons attending or participating in such meeting or conversation.

I. You are required by Florida law to produce all requested documents or communications, wherever located, that are in your possession, custody, or control, including documents or communications that you have a right to obtain, or to compel the production of, from any third party (including, but not limited to, any financial institution and telephone carrier).

J. With respect to each request, Plaintiffs request that you identify and produce all documents

or communications that are known to you or that you can locate or discover that are in your possession, custody or control, from whatever source derived, which, directly or indirectly, relate, refer or pertain to the subject matter of the request made, including, without limitation, all such documents or communications in the files (whether they be denominated personal, business or any other files) in the possession, custody or control of you or, as applicable, of your employees, agents, representatives or other persons acting on your behalf or under your control.

- K. Plaintiffs request that, if you have no documents or communications responsive to a request, then you shall so state.
- L. If you assert that any requested document or communication has been lost, destroyed, or discarded, please identify each such document as completely as possible, and provide the following information:
 - a. the date of loss, destruction, or discarding;
 - b. the circumstances of the loss, destruction, or discarding; and
 - c. if destroyed or discarded:
 - i. the manner of destruction or discarding;
 - ii. the reason for destruction or discarding;
 - iii. the identity of the person authorizing the destruction or discarding; and
 - iv. the identity of the person who destroyed or discarded the document or communication.
- M. Plaintiffs request that you produce all responsive documents, communications, or other materials in an orderly manner (and with appropriate markings or other identification) so that Plaintiffs will be able to identify the source of the document, communication, other material, the file in which the document, communication, or other material was maintained, the person to whom such file belongs, and the specific request to which the document, communication, or other material is responsive.
- N. These requests shall be deemed to be continuing so as to require further and supplemental production if you receive or discover additional documents, communications, or other material between the time of original production and the time of any hearing, trial, or other presentation of evidence in this matter.
- O. All documents or communications are to be produced in electronic form. Documents or communications produced electronically should be produced in native format with all metadata intact. For any election or voter data file, please produce in CSV format if available. If this is not available, please produce in PDF format. For other documents or

communications, to the extent documents or communications can be accurately represented in black and white, they should be produced in single-page Tagged Image File Format (“TIFF”), together with any related field-delimited load files (e.g., Concordance DAT, CSV, OPT, LOG). Each TIFF document or communication shall be produced with an image load file in standard Opticon (*.log) format that reflects the parent / child relationship and also includes the beginning Bates number; ending Bates number; beginning Attachment Bates number; ending Attaching Bates number; custodian; date sent (for email messages); date modified (for email and non-email messages) where information is available; author (for email and non-email messages); and subject (for email messages). The TIFF images shall also be accompanied by extracted text or, for those files that do not have extracted text upon being processed (such as hard copy documents), optical character recognition (“OCR”) text data; such extracted text or OCR text data shall be provided in document level form and named after the TIFF image. Documents or communications that contain redactions shall be OCR’d after the redaction is applied to the image, and the OCR will be produced in place of extracted text at the document level. Notwithstanding the foregoing, the parties may negotiate a separate production format (including native format) for any documents or communications not reasonably producible or readable as standard image files, such as audio files or large spreadsheets.

- P. For documents or communications produced in TIFF format that originated in electronic form, metadata shall be included with the data load files described above and shall include (at a minimum) the following information: file name (including extension); original file path; page count; creation date and time; last saved date and time; last modified date and time; author; custodian of the document or communications (that is, the custodian from whom the document or communication was collected or, if collected from a shared drive or server, the name of the shared drive or server); and MD5 hash value. In addition, for email documents or communications, the data load files shall also include the following metadata: sent date; sent time; received date; received time; “to” name(s) and address(es); “from” name and address; “cc” name(s) and address(es); “bcc” name(s) and address(es); subject; names of attachment(s); and attachment(s) count. All images and load files must be named or put in folders in such a manner that all records can be imported without modification of any path or file name information.
- Q. If a responsive communication, document, or tangible thing has been prepared in copies that are not identical, or if additional copies have been made that are no longer identical, or if original identical copies are no longer identical by reason of subsequent notations on the front or back of pages thereto, each non-identical copy is a separate communication, document, or tangible thing and shall be produced.
- R. Produce any password-protected documents or communications with any applicable passwords.

RECORDS TO BE PRODUCED

1. All documents and communications related to your February 1, 2022 request to the Supreme Court of Florida for an advisory opinion regarding the Fair Districts Amendments, including but not limited to any documents or communications relating to the decision to seek the advisory opinion, or any documents or communications relating to the Supreme Court of Florida's subsequent order denying the advisory opinion.
2. All documents and communications relating to the Fair Districts Amendments, including but not limited to all documents or communications regarding the applicability of the Fair Districts Amendments or previous judicial opinions or judicial orders regarding the Fair Districts Amendments to any Proposed Plan.
3. All documents and communications relating to the drawing, consideration, or adoption of congressional districts for the 2020 congressional redistricting cycle, including but not limited to communications between and/or among your employees, staff, officers, agents, or representatives, and including but not limited to:
 - a. All documents and communications with or relating to Robert Popper;
 - b. All documents and communications with or relating to Adam Foltz, John Gore, Hans von Spakovsky, Chris Coates, Michael Barley, or Scott Kellar;
 - c. All documents and communications relating to testimony or presentations before the Legislature, including but not limited to any testimony or presentations provided by Alex Kelley.
 - d. All documents and communications between you and the Legislature related to congressional redistricting from June 1, 2021 to the present, including all documents or communications relating to meetings—both formal and informal—with the Legislature related to the drawing of congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Legislature or their staff; minutes, agendas, or presentations from legislative hearings or meetings; and any related communications, including, but not limited to, those with any member of the Legislature (or representatives thereof).
 - e. All documents and communications relating to the March 29, 2022 memorandum from Ryan Newman entitled “Constitutionality of CS/SB 102, An Act Relating to Establishing the Congressional Districts of the State.”
4. All documents and communications concerning Plan P000C0079, Plan P000C0094, and any other Proposed Plan (as specified in the definition above), including but not limited to:
 - a. All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in any Proposed Plan.

- b. All documents and communications concerning any factors that were considered in the creation, consideration, and/or passage of any Proposed Plan.
 - c. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.
- 5. Documents and communications sufficient to establish all persons who assisted you in the creation of any Proposed Plan.
- 6. All documents and communications relating to information that was used to draw congressional district maps for Florida in 2022, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.
- 7. All documents and communications, including, without limitation, requests for proposals, proposals, contracts, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, Adam Foltz, that were consulted, involved in, or communicated with by you, any member of the Legislature or its staff, relating to any Proposed Plan.
- 8. All documents and communications relating to drawing any Proposed Plan, with (1) any current or former member of Florida's Legislature and (2) any current or former staff of any current or former member of Florida's Legislature.
- 9. All documents and communications relating to drawing any Proposed Plan with (1) any current U.S Representative or U.S. Senator, including without limitation United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current U.S. Representative or U.S. Senator.
- 10. All documents and communications relating to Congressional redistricting with the Republican National Committee, the Florida Republican Party, including, without limitation, Joe Gruters, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.