

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION**

Common Cause Florida, FairDistricts  
Now, Florida State Conference of the  
National Association for the  
Advancement of Colored People  
Branches, Cassandra Brown, Peter  
Butzin, Charlie Clark, Dorothy Inman-  
Johnson, Veatrice Holifield Farrell,  
Brenda Holt, Rosemary McCoy, Leo R.  
Stoney, Myrna Young, and Nancy  
Ratzan,

*Plaintiffs,*

v.

Cord Byrd, in his official capacity as  
Florida Secretary of State,

*Defendant.*

Case No. 4:22-cv-109-AW-MAF

**JOINT MOTION FOR CONTINUANCE OF TRIAL AND PRE-TRIAL  
DEADLINES**

Plaintiffs Common Cause Florida, FairDistricts Now, Florida State  
Conference of the National Association for the Advancement of Colored People  
Branches, Cassandra Brown, Peter Butzin, Charlie Clark, Dorothy Inman-Johnson,  
Veatrice Holifield Farrell, Brenda Holt, Rosemary McCoy, Leo R. Stoney, Myrna  
Young, and Nancy Ratzan (collectively the “Plaintiffs”), and Defendant Cord  
Byrd, in his official capacity as Florida Secretary of State, file this joint motion to  
respectfully request the Court for a continuance of the start of trial from Monday,

September 25, 2023 to Tuesday, September 26, 2023 and to set the pre-trial deadlines that the parties have agreed to below. In support, the parties state the following:

1. The start of trial for this matter is currently September 25. Doc. 122. This falls on the Jewish holiday of Yom Kippur.
2. Given that a number of attorneys for the parties observe Yom Kippur, the parties respectfully request that the Court move the start of trial to September 26.
3. The parties believe that they will still be able to complete the trial within the two-week span—between September 25 and October 6—reserved by the Court in its December 23, 2022, scheduling order. Doc. 122.
4. Furthermore, to accommodate for the Defendant’s trial in the state-redistricting case (*BVM v. Byrd*, 2022 CA 666 (Fla. 2d Jud. Cir.)), between August 22 and September 1, the parties submit the following pre-trial deadlines for the Court’s consideration:

<b>Pre-Trial Event</b>	<b>Deadline</b>
Parties exchange exhibit lists	September 5, 2023
Parties exchange deposition designations	September 5, 2023
Parties exchange deposition counter-designations	September 12, 2023
Parties exchange witness lists	September 12, 2023
Parties file pre-trial briefs (no more than 12,000 words) with the Court	September 19, 2023
Party tendering a witness provides a list of the exhibits that the witness will introduce into evidence	72 hours before the witness is called

The other party provides objections to the aforementioned list of exhibits	24 hours before the witness is called
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WHEREFORE, the parties jointly and respectfully request that the Court issue a continuance of the start of trial to September 26, 2023, and enter the pre-trial deadlines agreed to by the parties.

/s/ Gregory L. Diskant

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*\*Admitted Pro hac vice*

**LOCAL RULE CERTIFICATIONS**

I certify that the parties have conferred and thus complied with the attorney-conference requirement of Local Rule 7.1(B). This is a joint motion.

This motion contains 362 words and complies with the word-count requirement of Local Rule 7.1(F).

/s/ Michael Beato  
Michael Beato

**CERTIFICATE OF SERVICE**

I certify that on August 4, 2023, the foregoing was filed through the Court's CM/ECF, which will serve a copy to all counsel of record.

/s/ Michael Beato  
Michael Beato