IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 1:22-cv-24066-KMM

GRACE, INC., et al.,

Plaintiffs,

v.

CITY OF MIAMI,

Defendant.

PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY

Pursuant to Local Rule 7.8, Plaintiffs give notice of the following supplemental authority: *Common Cause, Fla. v. Byrd*, No. 4:22-cv-109-AW-MAF, 2024 WL 1308119, at *39–42, 45–47 (N.D. Fla. Mar. 27, 2024) (three-judge court) (per curiam).

The decision is the district court's findings of fact and conclusions of law in a challenge to Florida's congressional map under a different Fourteenth Amendment theory. But pertinent to this case, the decision (1) applies the one plaintiff standing rule in a decision on the merits and (2) finds that a membership organization can establish standing to challenge electoral districts with similar evidence as in this case, including when the organization keeps confidential the details of its membership information.

The decision supports Plaintiffs' Proposed Findings of Fact and Conclusions of Law (ECF No. 181) ¶¶ 7, 26–28.

Respectfully submitted March 29, 2024,

/s/ Nicholas L.V. Warren

Nicholas L.V. Warren (FBN 1019018) ACLU Foundation of Florida 1809 Art Museum Drive, Suite 203 Jacksonville, FL 32207 Neil A. Steiner* Julia Markham-Cameron* Dechert LLP Three Bryant Park (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 dtilley@aclufl.org cmcnamara@aclufl.org

Gregory P. Luib* Dechert LLP 1900 K Street NW Washington, DC 20006 (202) 261-3413 gregory.luib@dechert.com 1095 Avenue of the Americas New York, NY 10036 (212) 698-3822 neil.steiner@dechert.com julia.markham-cameron@dechert.com

Christopher J. Merken* **Dechert LLP** Cira Centre 2929 Arch Street Philadelphia, PA 19104 (215) 994-2380 christopher.merken@dechert.com

* Admitted pro hac vice

Counsel for Plaintiffs