

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

BLACK VOTERS MATTER CAPACITY
BUILDING INSTITUTE, INC., et al.,

Plaintiffs,

v.

CORD BYRD, in his official capacity as
Florida Secretary of State, et al.,

Defendants.

Case No.: 2022 CA 0666

**PLAINTIFF BLACK VOTERS MATTER CAPACITY BUILDING INSTITUTE'S
OBJECTIONS AND RESPONSES TO DEFENDANT THE FLORIDA SENATE'S FIRST
REQUEST FOR PRODUCTION TO ORGANIZATIONAL PLAINTIFFS**

Pursuant to Florida Rule of Civil Procedure 1.350, Plaintiff Black Voters Matter Capacity Building Institute, Inc. ("BVM" or "Plaintiff") submits these objections and responses to Defendant Florida Senate's First Requests for Production to Organizational Plaintiffs, served on Plaintiffs on July 28, 2022. These objections and responses reflect Plaintiff's current knowledge and information. Plaintiff reserves the right to alter, supplement, amend, or otherwise modify these objections and responses based on later recollections or the discovery of additional documents or information.

**PRELIMINARY STATEMENT OF OBJECTIONS
AND RESERVATION OF RIGHTS**

These responses and objections are made without waiving or intending to waive but, on the contrary, preserving and intending to preserve, the following objections (the "Preliminary Objections"):

1. Plaintiff objects to each instruction, definition, and request to the extent that it purports to impose any requirement or discovery obligation greater than or different from those

under the Florida Rules of Civil Procedure and the applicable Rules and Orders of the Court.

2. These responses and objections are based on Plaintiff's understanding of each individual request. Nothing in them should be taken as an admission that Plaintiff agrees with the Florida Senate's use or interpretation of terms. If the Florida Senate asserts an interpretation of any request that is inconsistent with Plaintiffs' understanding, Plaintiff reserves the right to supplement its responses and objections.

3. Plaintiff objects to each request to the extent it seeks information protected by the attorney work product doctrine, the attorney-client privilege, a joint or common interest privilege, the First Amendment associational privilege, or any other privilege recognized by law, to which no exception or waiver applies. By providing certain information requested herein, Plaintiff does not waive any privilege or protection that is or may be applicable to such information.

4. Plaintiff objects to the requests to the extent that they seek proprietary and confidential information, the disclosure or dissemination of which could cause Plaintiff harm or prejudice.

5. Plaintiff objects to the requests to the extent they seek documents or information that would invade the privacy rights of individuals not parties to the litigation, are overly broad, unduly burdensome, vague, ambiguous, or are not reasonably calculated to lead to the discovery of admissible evidence. As to all requests, Plaintiff will reasonably interpret them according to their best understanding of the words used, given the relevant circumstances.

6. Plaintiff objects to any request to the extent it seeks information that is publicly available, or to which the propounding party or propounding party's counsel have access equal to Plaintiff or which it could obtain with equal effort. Plaintiff will not search for and produce publicly available information in responding to the Florida Senate's requests.

7. Plaintiff objects to the requests to the extent they seek discovery of electronically stored information from sources that are not reasonably accessible in light of the burdens or costs required to identify, locate, restore, review, and produce whatever responsive information may be found. More easily accessed sources—such as active servers, hard drives, and other direct access storage media containing active data and information potentially responsive to the Florida Senate’s requests for production—are likely to yield all the information that is reasonably useful for this action. Further, production of information from inaccessible sources may also be unreasonably cumulative and duplicative because information that might be obtained is also obtainable, to the extent it exists, from other sources that are more convenient, less burdensome, or less expensive. Plaintiff will produce documents in a readily accessible format. Plaintiff will produce, unless otherwise objectionable, electronically stored information that is responsive and reasonably accessible. Plaintiff believes that the Florida Senate should review and evaluate the information from such sources before requesting that Plaintiffs search for and produce information contained on sources that are not reasonably accessible. If, after such review and evaluation, the Florida Senate continues to seek discovery of information from sources that have been identified as not reasonably accessible, Plaintiff requests that the parties meet and confer to discuss, among other things, the particular types of information sought by Defendant and their relevance to the parties’ respective claims and defenses, the burdens and costs of accessing, retrieving and reviewing such information, the needs that may establish “good cause” for requiring all or part of the requested discovery notwithstanding its inaccessibility, and conditions on obtaining and producing the information that may be appropriate, including whether the Florida Senate is willing to pay the costs associated with such discovery.

8. Plaintiff objects to the requests as substantially overbroad and unduly burdensome

to the extent they lack reasonable geographical or temporal restrictions. The Florida Senate's Requests are substantially overbroad and unduly burdensome to the extent they purport to require Plaintiff to produce information or documents unrelated to the time period in this lawsuit.

9. Plaintiff incorporates by reference every Preliminary Objection set forth above into each specific response set forth below. A specific response may repeat one or more of these Preliminary Objections for emphasis or some other reason. The failure to include any Preliminary Objection in any specific response does not waive any Preliminary Objection to that request. Any effort to search for or provide information or documents in response to any specific request remains subject to the objections.

RESPONSES TO REQUESTS

REQUEST FOR PRODUCTION NO. 1: Any and all documents identified in your answers to the Florida Senate's First Interrogatories to the Organizational Plaintiffs.

RESPONSE: BVM has included any and all documents identified in their answers to the Florida Senate's First Interrogatories in a ShareFile link to be provided under separate cover.

REQUEST FOR PRODUCTION NO. 2: Any and all documents used by you or your counsel in preparation of your answers to the Florida Senate's First Interrogatories to the Organizational Plaintiffs.

RESPONSE: Subject to and expressly reserving their preliminary objections, BVM responds that it has no nonprivileged documents responsive to Request for Production No. 2.

REQUEST FOR PRODUCTION NO. 3: Any and all documents that evidence, relate to, or refer to your claims and allegations in the Complaint.

RESPONSE: In addition to its preliminary objections, BVM objects to Request for Production No. 3 as premature, because it seeks "any and all documents" that relate to the claims

and allegations in the Complaint at a time when Plaintiffs have not completed discovery. BVM further objects to Request for Production No. 3 to the extent it asks it to produce documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their motion for a preliminary injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 4: Any and all documents, correspondence, memoranda, e-mails, or other writings you have consulted or upon which you have relied in preparation of the Complaint.

RESPONSE: Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 5: Any and all written or otherwise recorded or documented statements concerning this action or the subject of this action made by any party to this action or third party with firsthand knowledge of any facts concerning the subject matter of

this action.

RESPONSE: In addition to their preliminary objections, BVM objects to Request for Production No. 5 as premature, because it seeks “any and all written or otherwise recorded or documented statement concerning this action or the subject of this action” prior to the discovery cutoff date. BVM further objects to Request for Production No. 5 to the extent it asks it to produce documents not in their possession, custody, or control.

Subject to and expressly reserving its preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM will not withhold any nonprivileged, responsive materials that are identified in their good faith search and that fall within that date range.

REQUEST FOR PRODUCTION NO. 6: Any and all expert reports received by you, your agents, or your counsel in connection with this litigation, and copies of all documents and materials provided to any expert retained by you, your agents, or your counsel in connection with this litigation.

RESPONSE: In addition to its preliminary objections, BVM objects to this request as premature. Plaintiffs will produce any expert materials that they are obligated to produce under the Florida Rules of Civil Procedure in accordance with the time period for exchanging such information set by the Court.

Subject to and expressly reserving its preliminary objections, BVM directs the Florida Senate to the expert reports of Dr. Stephen Ansolabehere and Dr. Sharon Austin, which were served on April 26, 2022 as exhibits to Plaintiffs’ Motion for Temporary Injunction, and to the rebuttal expert report of Dr. Stephen Ansolabehere, which was served on May 10, 2022 as an

exhibit to Plaintiffs' Reply Brief in Support of Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 7: Any and all documents that evidence, relate to, or refer to your allegations in Count I of the Complaint.

RESPONSE: In addition to its preliminary objections, BVM objects to Request for Production No. 7 as premature because it asks it to identify "any and all documents" that support the allegations in Count I of the Complaint prior to the discovery cutoff date. BVM further objects to Request for Production No. 7 to the extent it asks it to identify documents not in its possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 8: Any and all documents that evidence, relate to, or refer to your allegations in Count II of the Complaint.

RESPONSE: In addition to its preliminary objections, BVM objects to Request for Production No. 8 as premature because it asks it to identify "any and all documents" that support the allegations in Count II of the Complaint prior to the discovery cutoff date. BVM further objects to Request for Production No. 8 to the extent it asks it to identify documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 9: Any and all documents that evidence, relate to, or refer to your allegations in Count III of the Complaint.

RESPONSE: In addition to its preliminary objections, BVM objects to Request for Production No. 9 as premature because it asks it to identify “any and all documents” that support the allegations in Count III of the Complaint prior to the discovery cutoff date. BVM further objects to Request for Production No. 9 to the extent it asks BVM to identify documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 10: Any and all documents that evidence, relate to, or refer to your allegations in Count IV of the Complaint.

RESPONSE: In addition to its preliminary objections, BVM to Request for Production No. 10 as premature because it asks it to identify “any and all documents” that support the allegations in Count IV of the Complaint prior to the discovery cutoff date. BVM further objects to Request for Production No. 10 to the extent it asks it to identify documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 11: Any and all documents that evidence, relate to, or refer to your allegations in Count V of the Complaint.

RESPONSE: In addition to their preliminary objections, BVM objects to Request for Production No. 11 as premature because it asks it to identify “any and all documents” that support the allegations in Count V of the Complaint prior to the discovery cutoff date. BVM further objects to Request for Production No. 11 to the extent it asks it to identify documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other

evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 12: Any and all documents that evidence, relate to, or refer to your allegation in paragraph 86 of the Complaint that “there are no districts in North Florida that will permit Black voters to elect candidates of their choice.”

RESPONSE: In addition to its preliminary objections, BVM objects to Request for Production No. 12 as premature because it asks it to identify “any and all documents” that support the allegations in paragraph 86 of the Complaint prior to the discovery cutoff date. BVM further objects to Request for Production No. 12 to the extent it asks it to identify documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 13: Any and all documents that evidence, relate to, or refer to your allegation in paragraph 88 of the Complaint that “[e]very legislative staff member and legislator involved in redrawing those boundaries acknowledged that, as to CD-5 in particular, complaint with the Fair Districts Amendment required that the Black voters of North Florida be able to elect their candidates of choice.”

RESPONSE: In addition to its preliminary objections, BVM objects to Request for Production No. 13 as premature because it asks it to identify “any and all documents” that support the allegations in paragraph 88 of the Complaint prior to the discovery cutoff date. BVM further objects to Request for Production No. 13 to the extent it asks it to identify documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 14: Any and all documents that evidence, relate to, or refer to your allegation in paragraph 101 of the Complaint that SB 2-C, “[w]ith nearly every line-drawing decision, . . . advantages the Republican Party.”

RESPONSE: In addition to its preliminary objections, BVM objects to Request for Production No. 14 as premature because it asks it to identify “any and all documents” that support the allegations in paragraph 101 of the Complaint prior to the discovery cutoff date. BVM further objects to Request for Production No. 14 to the extent it asks them to identify documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs

the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 15: Any and all documents that evidence, relate to, or refer to your allegations in paragraphs 102, 103, 104, and 105 of the Complaint involving the number of congressional seats you allege that Democrats or Republicans were or are expected to win under the referenced congressional district maps.

RESPONSE: In addition to its preliminary objections, BVM objects to Request for Production No. 15 as premature because it asks them to identify “any and all documents” that support the allegations in paragraphs 102, 103, 104, and 105 of the Complaint prior to the discovery cutoff date. BVM further objects to Request for Production No. 15 to the extent it asks it to identify documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 16: Any and all documents that evidence, relate to, or refer to your allegation in paragraph 109 of the Complaint that SB 2-C “is an intentional partisan gerrymander.”

RESPONSE: In addition to its preliminary objections, BVM to Request for Production No. 13 as premature because it asks it to identify “any and all documents” that support the allegations in paragraph 109 of the Complaint prior to the discovery cutoff date. BVM further objects to Request for Production No. 16 to the extent it asks it to identify documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 17: Any and all documents and/or communications between you and all current and former employees, agents, elected officials, and officers of the Florida Senate regarding the subject matter of this litigation.

RESPONSE: Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM will not withhold any nonprivileged, responsive materials that are identified in their good faith search and that fall within that date range. BVM is not presently aware of any nonprivileged, responsive documents responsive to this request.

REQUEST FOR PRODUCTION NO. 18: Any and all documents and/or communications between you and all current and former employees, agents, elected officials, and officers of the Florida House of Representatives regarding the subject matter of this litigation.

RESPONSE: Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM will not withhold any nonprivileged, responsive materials that are identified in their good faith search and that fall within that date range. BVM is not presently aware of any nonprivileged, responsive documents responsive to this request.

REQUEST FOR PRODUCTION NO. 19: Any and all documents and/or communications between you and all current and former employees, agents, and officers of the Executive Office of the Governor of Florida regarding the subject matter of this litigation.

RESPONSE: Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM will not withhold any nonprivileged, responsive materials that are identified in their good faith search and that fall within that date range. BVM is not presently aware of any nonprivileged, responsive documents responsive to this request.

REQUEST FOR PRODUCTION NO. 20: Any and all documents and/or communications between you and all current and former employees, agents, elected officials, and officers of a Florida Supervisor's of Elections Office regarding the subject matter of this litigation.

RESPONSE: Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged

documents in their possession, custody, or control from January 1, 2021 to the present. BVM will not withhold any nonprivileged, responsive materials that are identified in their good faith search and that fall within that date range. BVM is not presently aware of any nonprivileged, responsive documents responsive to this request.

REOUEST FOR PRODUCTION NO. 21: Any and all documents that demonstrate you have standing to challenge the congressional districts you are challenging as a part of this lawsuit.

RESPONSE: Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REOUEST FOR PRODUCTION NO. 22: Any and all documents that demonstrate any harm or injury that you have suffered or will suffer as a result of SB 2-C.

RESPONSE: Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

REQUEST FOR PRODUCTION NO. 23: Any and all documents that show the entirety of SB 2-C should be rejected, as opposed to the specific congressional districts that you are challenging.

RESPONSE: In addition to its Preliminary Objections, BVM objects to Request for Production No. 23 as premature, because it seeks “all documents and evidence” relating to “the rejection of SB 2-C in its entirety” at a time when Plaintiffs have not yet completed discovery. BVM further objects to Request for Production No. 23 to the extent it asks them to identify documents not in their possession, custody, or control.

Subject to and expressly reserving their preliminary objections, BVM is in the process of performing a good faith search and will produce responsive, nonprivileged documents in their possession, custody, or control from January 1, 2021 to the present. BVM further directs the Florida Senate to its response to Interrogatory No. 9, which identifies relevant documents and other evidence that Plaintiffs submitted as exhibits in support of their Motion for Temporary Injunction. Plaintiffs have already served these documents upon the Defendants and as such they are not being reproduced.

Dated: September 6, 2022

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 6, 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/ Thomas A. Zehnder
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