

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

COMMON CAUSE FLORIDA, *et al.*,

Plaintiffs,

Case No. 4:22-cv-00109-AW-MAF

v.

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

Defendants.

_____ /

**MOTION TO QUASH DEPOSITION SUBPOENA
OR ALTERNATIVELY FOR PROTECTIVE ORDER**

Plaintiffs have served a deposition subpoena on former State Senator Ray Rodrigues, who is not a party to this case. Senator Rodrigues moves to quash the deposition subpoena on the basis of the legislative privilege and the apex doctrine.

To promote the expeditious and efficient resolution of this dispute, Senator Rodrigues adopts and incorporates by reference the arguments contained in the Six Legislators' Motion to Quash Deposition Subpoenas or Alternatively for Protective Order (Document 126), which was filed with this Court on February 1, 2023. The deposition subpoena subsequently served on Senator Rodrigues should be quashed for the same reasons and to the same extent as the subpoenas Plaintiffs have directed to other members of the Florida Legislature.

LOCAL RULES CERTIFICATIONS

Counsel for the movant has conferred with all adverse parties and thus complied with the attorney-conference requirement of Local Rule 7.1(B). Plaintiffs oppose this motion.

This motion contains 118 words and therefore complies with the word-count requirement of Local Rule 7.1(F).

Respectfully submitted,

/s/ Daniel Nordby
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*Counsel for former State Senator Ray
Rodrigues*

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2023, I electronically filed the foregoing with the Clerk of Court by using CM/ECF, which automatically serves all counsel of record for the parties who have appeared.

/s/ Daniel Nordby
Daniel E. Nordby