

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

KELVIN JONES,

Plaintiffs,

v.

RON DESANTIS, in his official capacity as
Governor of the State of Florida, et al.,

Defendants.

CONSOLIDATED

Case No.: 4:19-cv-00300-RH/MJF
(Lead Case)

BONNIE RAYSOR, et al.,

Plaintiffs,

v.

LAUREL M. LEE, in her official capacity as
Secretary of State of Florida,

Defendant.

Case No.: 4:19-cv-00301-RH/MJF

JEFF GRUVER, et al.,

Plaintiffs,

v.

KIM BARTON, et al.,

Defendants.

Case No.: 4:19-cv-00302-RH/MJF

LUIS MENDEZ,

Plaintiff,

v.

RON DESANTIS, in his official capacity as
Governor of the State of Florida, et al.,

Defendants.

Case No: 4:19-cv-00272-RH/MJF

**BILL COWLES, SUPERVISOR OF ELECTIONS FOR ORANGE COUNTY'S
RESPONSE IN OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION
OR, IN THE ALTERNATIVE, FOR FURTHER RELIEF**

Defendant, Bill Cowles, Supervisor of Elections for Orange County (“Supervisor Cowles” or “Defendant”), responds in opposition to Plaintiffs’ Motion for Preliminary Injunction or, in the Alternative, for Further Relief (Doc. 108). Supervisor Cowles joins in the Response in Opposition of his fellow supervisor, Miami-Dade County Supervisor of Elections Christina White, who has concisely stated the primary basis for the opposition to the motion for injunctive relief by each of the named Supervisors of Elections: that the relief must be obtained from the Secretary of State, who is statutorily obligated to “[o]btain and maintain uniformity in the interpretation and implementation of the election laws ... [and] may ... adopt by rule uniform standards for the proper and equitable interpretation and implementation of the requirements of chapters 97 through 102 and 105 of the Election Code,” which is the precise relief that the Plaintiffs seek. Neither Supervisor Cowles, nor the ten named Supervisors collectively, can provide the relief requested by the Plaintiffs, whereas the Secretary of State can, pursuant to § 97.012(1), Florida Statutes (2019), Florida’s Election Code, quoted above. *See also Florida Democratic Party v. Detzner*, Case No. 4:16CV607-MW/CAS, 2016 WL 6090943 (N.D. Fla. Oct. 16, 2016) (ordering Secretary of State to issue a directive to supervisors of elections because “Florida law therefore vests [the Secretary of State] with the authority to ‘adopt by rule uniform standards’ for the ‘interpretation and implementation of’ the Florida Election Code.”)

Accordingly, Supervisor Cowles joins in the Response filed by Miami-Dade County Supervisor of Elections Christina White, and requests this Court to limit any injunctive relief

granted to enjoin only the Secretary of State as the statutorily authorized entity responsible for adopting by rule uniform standards for the implementation of Florida's Election Code.

Pursuant to N.D. Fla. Loc. R. 7.1 (F), Supervisor Cowles certifies that this Response, containing 442 words, exclusive of the Certificate of Service, is well below the 8,000-word limit applicable to this Response.

Respectfully submitted,

/s/ Nicholas A. Shannin

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General Counsel for Defendant, Bill Cowles,

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing using the Case Management/Electronic Case Filing ("CM/ECF") system on September 9, 2019, which will send a Notice of Electronic Filing to all counsel of record for the parties who have appeared.

/s/ Nicholas A. Shannin