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)

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

BONNIE RAYSOR, et al.,

Plaintiffs,

v.

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

Defendant.

JEFF GRUVER, et al.,

Plaintiffs,

v.

KIM BARTON, et al.,

Defendants.

LUIS MENDEZ,

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

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

Plaintiff,

v.

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

Defendants.

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UNOPPOSED MOTION TO DEEM BILL COWLES, SUPERVISOR OF ELECTIONS FOR ORANGE COUNTY'S RESPONSE IN OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION OR, IN THE ALTERNATIVE, FOR FURTHER RELIEF <u>TIMELY FILED</u>

Defendant, Bill Cowles, Supervisor of Elections for Orange County ("Supervisor Cowles" or "Defendant"), by and through his undersigned counsel, files this Unopposed Motion to Deem the Response in Opposition to Motion for Preliminary Injunction or, in the Alternative, for Further Relief of Defendant, Bill Cowles, Supervisor of Elections for Orange County, served on September 9, 2019, as timely filed and as grounds therefore states:

1. Responses to Plaintiffs' Motion for Preliminary Injunction or, in the Alternative, for Further Relief were scheduled to be filed on September 6, 2019.

2. Due to technical issues, the filing did not occur on September 6, 2019, but instead the morning of the next business day, September 9, 2019.

3. The undersigned counsel apologizes for the temporary delay caused. No party is prejudiced by the acceptance of the Response in Opposition to Motion for Preliminary Injunction or, in the Alternative, for Further Relief as timely filed and, instead, permitting the Response in Opposition to Motion for Preliminary Injunction or, in the Alternative, for Further Relief to be deemed timely filed will allow for the litigation to promptly proceed on the merits.

4. The undersigned counsel has contacted Eliza Sweren-Becker, counsel for the Gruver Plaintiffs, and certifies that Ms. Sweren-Becker, on behalf of all Plaintiffs collectively, has no objection to the relief requested.

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WHEREFORE, Defendant, Bill Cowles, Supervisor of Elections for Orange County,

respectfully requests this Court to deem the Response in Opposition to Motion for Preliminary

Injunction or, in the Alternative, for Further Relief filed on September 9, 2019, as timely filed.

Respectfully submitted,

<u>/s/ Nicholas A. Shannin</u> Nicholas A. Shannin, Esquire Florida Bar No. 0009570 Shannin Law Firm, P.A. 214 South Lucerne Circle East, Suite 200 Orlando, Florida 32801 Tel: (407) 985-2222 Email: <u>nshannin@shanninlaw.com</u> <u>service@shanninlaw.com</u> *General Counsel for Defendant, Bill Cowles, Supervisor of Elections for Orange County, Florida*

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.

<u>/s/ Nicholas A. Shannin</u> Nicholas A. Shannin, Esquire