

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
Tallahassee Division**

KELVIN LEON JONES, et al.,

Plaintiffs,

v.

Case No.: 4:19-cv-00300-MW-MJF

RON DESANTIS, in his official capacity
as the Governor of Florida
an indispensable party, et al.,

Defendants.

**MANATEE COUNTY'S RESPONSE TO PLAINTIFFS'
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

The Defendant, Michael Bennett, Manatee County Supervisor of Election's responds to Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment only to clarify one issue and says:

1. On pages 10-11 of the Motion, Plaintiffs suggest that the Secretary of State has failed to take some action or perhaps has created some confusion surrounding a newly added Plaintiff, Latoya Moreland. Plaintiffs attached an email with the undersigned as support for this argument. This characterization is somewhat misleading.

2. First, Ms. Moreland is ***not*** a party to the Preliminary Injunction Order, so there is no violation in any way of the Court's Order. Second, Ms. Moreland was removed in the ordinary course ***months*** before the Order was entered, so again there can be no issue with the Court's Order.

3. Third, the State had no input into the decision to remove Ms. Moreland – that was done at the Supervisor level in the ordinary course. The CCIS database was consulted, fines were

found to be outstanding, and the voter was notified in the ordinary course. Further, the removal of other voters in the same manner was identified in all of the Supervisor's responses to Interrogatories in this case.

4. Moreover, as reflected in the email exchange, once Plaintiffs' raised the issue with the Manatee Supervisor, the response was swift and immediate. The undersigned would point out, however, that part of speedy response was based on Plaintiffs' counsel's implication in her email that the parties were to work together to have late-filed Plaintiffs made subject to the Order. The undersigned has since discovered that there is no such agreement. Therefore, if Plaintiffs seek to argue that the State, or even the Manatee Supervisor, has created confusion or a need for Court intervention, the opposite is actually true – it was the Plaintiffs' counsel who has created (unnecessary) confusion in this matter.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail upon counsel of record for all parties in the above-captioned matter this 13th day of March 2020.



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