

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

FLORIDA RISING TOGETHER, et al.,

Plaintiffs,

v.

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

Defendants.

Case No. 4:21-cv-201-MW/MJF

**FLORIDA RISING PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Plaintiffs Florida Rising Together, UnidosUS, Equal Ground Education Fund, Hispanic Federation, Poder Latinx, Haitian Neighborhood Center Sant La, and Mi Familia Vota Education Fund (the "*Florida Rising* Plaintiffs") move for summary judgment on the following claims under Federal Rule of Civil Procedure 56 and Local Rule 56.1: Claims 5, 6, and 8 of the First Amended Complaint (ECF 59). The *Florida Rising* Plaintiffs' arguments are fully set forth in the attached Memorandum of Law in Support of Motion for Partial Summary Judgment.

Dated: November 12, 2021

JOHN A. FREEDMAN*
JEREMY C. KARPATKIN
ELISABETH S. THEODORE*
JANINE M. LOPEZ*
LESLIE C. BAILEY*
SAM I. FERENC*
Arnold & Porter Kaye Scholer LLP
601 Massachusetts Ave., N.W.
Washington, D.C. 20001-3743
(202) 942-5000
John.Freedman@arnoldporter.com
Jeremy.Karpatkin@arnoldporter.com
Elisabeth.Theodore@arnoldporter.com
Janine.Lopez@arnoldporter.com
Leslie.Bailey@arnoldporter.com
Sam.Ferenc@arnoldporter.com

JEFFREY A. MILLER*
Arnold & Porter Kaye Scholer LLP
3000 El Camino Road
Five Palo Alto Square, Suite 500
Palo Alto, CA 94306-3807
(650) 319-4500
Jeffrey.Miller@arnoldporter.com

AARON STIEFEL*
DANIEL R. BERNSTEIN*
RYAN D. BUDHU*
ANDREW R. HISCHEL*
Arnold & Porter Kaye Scholer LLP
250 West 55th Street
New York, NY 10019-9710
(212) 836-8000
Aaron.Stiefel@arnoldporter.com
Daniel.Bernstein@arnoldporter.com
Ryan.Budhu@arnoldporter.com

Respectfully submitted,

s/ Kira Romero-Craft
KIRA ROMERO-CRAFT
Florida Bar No. 49927
MIRANDA GALINDO*
LatinoJustice, PRLDEF
523 W. Colonial Drive
Orlando, FL 32804
(321) 418-6354
Kromero@latinojustice.org
Mgalindo@latinojustice.org

BRENDA WRIGHT*
DEMOS
80 Broad St, 4th Flr
New York, NY 10004
(212) 633-1405
bwright@demos.org

JUDITH BROWNE DIANIS**
GILDA R. DANIELS
JORGE VASQUEZ**
SABRINA KHAN**
ESPERANZA SEGARRA
Florida Bar No. 527211
SHARION SCOTT**
ADVANCEMENT PROJECT
1220 L Street, N.W., Suite 850
Washington, DC 20005
(202) 728-9557
Jbrowne@advancementproject.org
Gdaniels@advancementproject.org
Jvasquez@advancementproject.org
Skhan@advancementproject.org
Esegarra@advancementproject.org
Sscott@advancementproject.org

Attorneys for Plaintiffs

**Admitted pro hac vice*

***Application for admission pro hac
vice forthcoming*

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(D), an attorney conference was not conducted as the motion would determine the outcome of several of Plaintiffs' claims.

LOCAL RULE 7.1(F) CERTIFICATION

Pursuant to Local Rule 7.1(F), this motion contains 82 words. The attached Memorandum of Law in Support of Motion for Partial Summary Judgment contains 7,703 words, excluding the case style, signature block, and any certificate of service.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served on all counsel of record through the Court's CM/ECF system on the 12th of November, 2021.

s/ *Kira Romero-Craft*
Attorney for Plaintiffs