

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

FLORIDA RISING TOGETHER, FAITH
IN FLORIDA, UNIDOSUS, EQUAL
GROUND EDUCATION FUND,
HISPANIC FEDERATION, and PODER
LATINX,

Plaintiffs,

No. 4:21-cv-00201-AW-MJF

v.

LAUREL M. LEE, in her official capacity as
the Secretary of State of Florida, KIM
BARTON, in her official capacity as
Supervisor of Elections for ALACHUA
County, CHRIS MILTON, in his official
capacity as Supervisor of Elections for
BAKER County, MARK ANDERSEN, in
his official capacity as Supervisor of
Elections for BAY County, AMANDA
SEYFANG, in her official capacity as
Supervisor of Elections for BRADFORD
County, LORI SCOTT, in her official
capacity as Supervisor of Elections for
BREVARD County, JOE SCOTT, in his
official capacity as Supervisor of Elections
for BROWARD County, SHARON
CHASON, in her official capacity as
Supervisor of Elections for CALHOUN
County, PAUL A. STAMOULIS, in his
official capacity as Supervisor of Elections
for CHARLOTTE County, MAUREEN
“MO” BAIRD, in her official capacity as
Supervisor of Elections for CITRUS County,
CHRIS H. CHAMBLESS, in his official
capacity as Supervisor of Elections for
CLAY County, JENNIFER J. EDWARDS,
in her official capacity as Supervisor of
Elections for COLLIER County, TOMI S.

BROWN, in her official capacity as Supervisor of Elections for COLUMBIA County, MARK NEGLEY, in his official capacity as Supervisor of Elections for DESOTO County, STARLET CANNON, in her official capacity as Supervisor of Elections for DIXIE County, MIKE HOGAN, in his official capacity as Supervisor of Elections for DUVAL County, DAVID H. STAFFORD, in his official capacity as Supervisor of Elections for ESCAMBIA County, KAITI LENHART, in her official capacity as Supervisor of Elections for FLAGLER County, HEATHER RILEY, in her official capacity as Supervisor of Elections for FRANKLIN County, SHIRLEY KNIGHT, in her official capacity as Supervisor of Elections for GADSDEN County, CONNIE SANCHEZ, in her official capacity as Supervisor of Elections for GILCHRIST County, ALETRIS FARNAM, in her official capacity as Supervisor of Elections for GLADES County, JOHN HANLON, in his official capacity as Supervisor of Elections for GULF County, LAURA HUTTO, in her official capacity as Supervisor of Elections for HAMILTON County, DIANE SMITH, in her official capacity as Supervisor of Elections for HARDEE County, BRENDA HOOTS, in her official capacity as Supervisor of Elections for HENDRY County, SHIRLEY ANDERSON, in her official capacity as Supervisor of Elections for HERNANDO County, PENNY OGG, in her official capacity as Supervisor of Elections for HIGHLANDS County, CRAIG LATIMER, in his official capacity as Supervisor of Elections for HILLSBOROUGH County, THERISA MEADOWS, in her official capacity as

Supervisor of Elections for HOLMES County, LESLIE R. SWAN, in her official capacity as Supervisor of Elections for INDIAN RIVER County, CAROL A. DUNAWAY, in her official capacity as Supervisor of Elections for JACKSON County, MARTY BISHOP, in his official capacity as Supervisor of Elections for JEFFERSON County, TRAVIS HART, in his official capacity as Supervisor of Elections for LAFAYETTE County, ALAN HAYS, in his official capacity as Supervisor of Elections for LAKE County, TOMMY DOYLE, in his official capacity as Supervisor of Elections for LEE County, MARK EARLEY, in his official capacity as Supervisor of Elections for LEON County, TAMMY JONES, in her official capacity as Supervisor of Elections for LEVY County, GRANT CONYERS, in his official capacity as Supervisor of Elections for LIBERTY County, HEATH DRIGGERS, in his official capacity as Supervisor of Elections for MADISON County, MICHAEL BENNETT, in his official capacity as Supervisor of Elections for MANATEE County, WESLEY WILCOX, in his official capacity as Supervisor of Elections for MARION County, VICKI DAVIS, in her official capacity as Supervisor of Elections for MARTIN County, CHRISTINA WHITE, in her official capacity as Supervisor of Elections for MIAMI-DADE County, JOYCE GRIFFIN, in her official capacity as Supervisor of Elections for MONROE County, JANET H. ADKINS, in her official capacity as Supervisor of Elections for NASSAU County, PAUL A. LUX, in his official capacity as Supervisor of Elections for OKALOOSA County, MELISSA ARNOLD, in her official capacity

as Supervisor of Elections for OKEECHOBEE County, BILL COWLES, in his official capacity as Supervisor of Elections for ORANGE County, MARY JANE ARRINGTON, in her official capacity as Supervisor of Elections for OSCEOLA County, WENDY LINK, in her official capacity as Supervisor of Elections for PALM BEACH County, BRIAN CORLEY, in his official capacity as Supervisor of Elections for PASCO County, JULIE MARCUS, in her official capacity as Supervisor of Elections for PINELLAS County, LORI EDWARDS, in her official capacity as Supervisor of Elections for POLK County, CHARLES OVERTURF, in his official capacity as Supervisor of Elections for PUTNAM County, TAPPIE A. VILLANE, in her official capacity as Supervisor of Elections for SANTA ROSA County, RON TURNER, in his official capacity as Supervisor of Elections for SARASOTA County, CHRISTOPHER ANDERSON, in his official capacity as Supervisor of Elections for SEMINOLE County, VICKY OAKES, in her official capacity as Supervisor of Elections for ST. JOHNS County, GERTRUDE WALKER, in her official capacity as Supervisor of Elections for ST. LUCIE County, WILLIAM KEEN, in his official capacity as Supervisor JENNIFER M. KINSEY, in her official capacity as Supervisor of Elections for SUWANNEE County, DANA SOUTHERLAND, in her official capacity as Supervisor of Elections for TAYLOR County, DEBORAH OSBORNE, in her official capacity as Supervisor of Elections for UNION County, LISA LEWIS, in her official capacity as Supervisor of Elections

for VOLUSIA County, JOSEPH R. MORGAN, in his official capacity as Supervisor of Elections for WAKULLA County, BOBBY BEASLEY, in his official capacity as Supervisor of Elections for WALTON County, and CAROL FINCH RUDD, in her official capacity as Supervisor of Elections for WASHINGTON County,
Defendants,

REPUBLICAN NATIONAL COMMITTEE; and NATIONAL REPUBLICAN SENATORIAL COMMITTEE,

Intervenor-Defendants.

INTERVENOR-DEFENDANTS' ANSWER TO AMENDED COMPLAINT

Intervenors—the Republican National Committee and National Republican Senatorial Committee—now answer Plaintiffs’ amended complaint (Doc. 59). Unless expressly admitted below, every allegation in the complaint is denied. When Intervenors say something “speaks for itself,” they do not admit that the referenced material exists, is accurate, or is placed in the proper context. Accordingly, Intervenors state:

1. The cited authorities speak for themselves. The remaining allegations are denied.

2. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny this allegation.

3. The first and second sentences are denied. Intervenors admit that HB 1355 (2011) and SB 7066 (2019) were enacted. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny the other allegations.

4. The first sentence is denied. SB 90 speaks for itself. The remaining allegations are denied.

5. Intervenors admit that the Florida Legislature enacted SB 90. Intervenors lack sufficient information to admit or deny the other allegations.

6. SB 90 speaks for itself. Intervenors lack sufficient information regarding the Plaintiffs’ “strategies and mechanisms” to admit or deny those allegations. The remaining allegations are denied.

7. SB 90 and turnout data speak for themselves. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny the other allegations.

8. SB 90 speaks for itself. Intervenors lack sufficient information to admit or deny the other allegations.

9. SB 90 speaks for itself. Intervenors lack sufficient information to admit or deny the other allegations. The last sentence is denied.

10. The first sentence and last sentences are denied. SB 90 speaks for itself. Intervenors lack sufficient information to admit or deny the other allegations.

11. The first sentence and second sentences are denied. The legislative history of SB 90 and quotations speak for themselves.

12. The first sentence is denied. The legislative history of SB 90 and quotation speak for themselves.

13. The legislative history of SB 90 and referenced surveys speak for themselves. According to Justice Stevens' lead opinion in *Crawford v. Marion County Election Board*, the "risk of voter fraud" is "real," voter fraud "could affect the outcome of a close election," and "[t]here is no question about the legitimacy or importance of the State's interest" in combatting it. 553 U.S. 181, 196 (2008); *see also Greater Birmingham Ministries v. Sec'y of State for Ala.*, 992 F.3d 1299, 1334 (11th Cir. 2021) ("[D]eterring voter fraud is a legitimate policy on which to enact an election law, even in the absence of any record evidence of voter fraud."); *Common Cause/Ga. v. Billups*, 554 F.3d 1340, 1353 (11th Cir. 2009) ("Georgia has an interest in preventing election fraud"). The final sentence is denied.

14. SB 90 speaks for itself. The remaining allegations are denied.

15. SB 90 and the cited authority speak for themselves. The remaining allegations are denied.

16. SB 90 speaks for itself. The remaining allegations consist of legal arguments that require no response. To the extent the remaining allegations require a response, they are denied.

17. Denied.

18. Denied.

19. Denied.

20. Intervenors lack sufficient information to admit or deny these allegations.

21. Intervenors lack sufficient information to admit or deny these allegations.

22. Intervenors lack sufficient information to admit or deny these allegations.

23. Intervenors lack sufficient information to admit or deny these allegations.

24. Intervenors lack sufficient information to admit or deny these allegations.

25. Intervenors lack sufficient information to admit or deny these allegations.

26. Intervenors lack sufficient information to admit or deny these allegations.

27. Intervenors lack sufficient information to admit or deny these allegations.

28. Intervenors lack sufficient information to admit or deny these allegations.

29. Intervenors lack sufficient information to admit or deny these allegations.

30. Intervenors lack sufficient information to admit or deny these allegations.

31. Intervenors lack sufficient information to admit or deny these allegations.

32. Intervenors lack sufficient information to admit or deny these allegations.

33. Intervenors lack sufficient information to admit or deny these allegations.
34. Intervenors lack sufficient information to admit or deny these allegations.
35. Intervenors lack sufficient information to admit or deny these allegations.
36. Intervenors lack sufficient information to admit or deny these allegations.
37. Intervenors lack sufficient information to admit or deny these allegations.
38. Intervenors lack sufficient information to admit or deny these allegations.
39. Intervenors lack sufficient information to admit or deny these allegations.
40. Intervenors lack sufficient information to admit or deny these allegations.
41. Intervenors lack sufficient information to admit or deny these allegations.
42. Intervenors lack sufficient information to admit or deny these allegations.
43. Intervenors lack sufficient information to admit or deny these allegations.
44. Intervenors lack sufficient information to admit or deny these allegations.
45. Intervenors lack sufficient information to admit or deny these allegations.
46. Intervenors lack sufficient information to admit or deny these allegations.
47. Intervenors lack sufficient information to admit or deny these allegations.
48. Intervenors lack sufficient information to admit or deny these allegations.
49. Intervenors lack sufficient information to admit or deny these allegations.
50. Intervenors lack sufficient information to admit or deny these allegations.
51. Intervenors lack sufficient information to admit or deny these allegations.
52. Intervenors lack sufficient information to admit or deny these allegations.
53. Intervenors lack sufficient information to admit or deny these allegations.

54. Intervenors lack sufficient information to admit or deny these allegations.

55. Intervenors lack sufficient information to admit or deny these allegations.

56. Intervenors lack sufficient information to admit or deny these allegations.

57. Intervenors lack sufficient information to admit or deny these allegations.

58. The first sentence is admitted. The cited authorities speak for themselves.

59. The first sentence is admitted. The cited authorities speak for themselves.

60. Intervenors admit that Plaintiffs have filed this action under 42 U.S.C. §1983 and under the First, Fourteenth and Fifteenth Amendments to the United States Constitution, but deny that Plaintiffs have any valid claim under the law or the United States Constitution.

61. This is a legal argument that requires no response.

62. This is a legal argument that requires no response.

63. The second sentence is admitted. Intervenors lack sufficient information to admit or deny the remaining factual allegations, and this paragraph contains legal arguments that require no response.

64. This is a legal argument that requires no response.

65. The first sentence is denied. The cited authority speaks for itself.

66. The cited authorities speak for themselves.

67. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny this allegation.

68. SB 90 speaks for itself. The cited authorities and letters speak for themselves.

69. Because Plaintiffs cite nothing, Intervenor's lack sufficient information to admit or deny these allegations.

70. The first sentence is denied. The cited articles and report speak for themselves.

71. The first sentence is denied. The cited authorities and statute speak for themselves.

72. Because Plaintiffs cite nothing, Intervenor's lack sufficient information to admit or deny this allegation.

73. The cited article speaks for itself.

74. Intervenor's admit that HB 1355 was enacted. The second sentence is denied. HB 1355 and the cited authorities speak for themselves. The final sentence is denied as a mischaracterization of the cited authority.

75. The referenced study speaks for itself.

76. The first sentence is denied. The cited authorities speak for themselves.

77. The first and third sentences are denied. The cited article speaks for itself. Because Plaintiffs cite nothing in the remaining allegations, Intervenor's lack sufficient information to admit or deny these allegations.

78. Intervenor's admit that SB 7066 was enacted. The cited report speaks for itself.

79. The first sentence is denied. The cited authority speaks for itself.

80. Denied as to SB 90. Because Plaintiffs cite nothing in these allegations, Intervenor's lack sufficient information to admit or deny them.

81. The first sentence is admitted. The cited quotations speak for themselves.

82. Turnout data speak for themselves.

83. Denied.

84. The legislative history of SB 90 and HB 7041 speaks for itself.

85. The second sentence is denied. The legislative history of SB 90 and HB 7041 and the quotations speak for themselves.

86. The referenced statements and quotations speak for themselves.

87. The referenced statements and quotations speak for themselves.

88. The last sentence is denied. Because Plaintiffs cite nothing, Intervenor's lack sufficient information to admit or deny the remaining allegations.

89. The legislative history of SB 90 speaks for itself.

90. Because Plaintiffs cite nothing, Intervenor's lack sufficient information to admit or deny these allegations.

91. The legislative history of SB 90 and quotations speak for themselves. States have no obligation to “prove specific instances of voter fraud.” *Common Cause/Ga.*, 554 F.3d at 1353.

92. The first sentence is denied. The legislative history of SB 90, referenced statements, and quotations speak for themselves. States have no obligation to “prove specific instances of voter fraud.” *Common Cause/Ga.*, 554 F.3d at 1353.

93. Quotations speak for themselves. States have no obligation to “prove specific instances of voter fraud.” *Common Cause/Ga.*, 554 F.3d at 1353.

94. Quotations speak for themselves. States have no obligation to “prove specific instances of voter fraud.” *Common Cause/Ga.*, 554 F.3d at 1353.

95. Quotations speak for themselves. States have no obligation to “prove specific instances of voter fraud.” *Common Cause/Ga.*, 554 F.3d at 1353.

96. Intervenors lack sufficient information to admit or deny these allegations. States have no obligation to “prove specific instances of voter fraud.” *Common Cause/Ga.*, 554 F.3d at 1353.

97. Quotations speak for themselves. States have no obligation to “prove specific instances of voter fraud.” *Common Cause/Ga.*, 554 F.3d at 1353.

98. The legislative history of SB 90 and HB 7041 speaks for itself. Intervenors otherwise lack sufficient information to admit or deny these allegations.

99. Denied.

100. The first sentence is admitted. Statements and the legislative history of SB 90 speak for themselves. Intervenors otherwise lack sufficient information to admit or deny these allegations.

101. The first sentence is denied. Quotations and the legislative history of SB 90 speak for themselves.

102. The legislative history of SB 90 speaks for itself.

103. The legislative history of SB 90 speaks for itself.

104. Intervenors admit that SB 90 was enacted.

105. The first sentence is denied. Intervenors admit that the Plaintiffs' Complaint challenges five provisions of SB 90, but denies that Plaintiffs are entitled to the relief sought in the Complaint.

106. Denied.

107. The first sentence is admitted. The statements and quotations speak for themselves.

108. Intervenors lack sufficient information to admit or deny these allegations.

109. This quotation speaks for itself.

110. Intervenors lack sufficient information to admit or deny these allegations.

111. Intervenors lack sufficient information to admit or deny the remaining allegations.

112. Admitted.

113. Florida law speaks for itself. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny these allegations.

114. SB 90 and statutes speak for themselves.

115. This is a legal argument that requires no response.

116. SB 90 and statutes speak for themselves. Intervenors lack sufficient knowledge to admit or deny the remaining allegations.

117. SB 90 and statutes speak for themselves. Intervenors lack sufficient knowledge to admit or deny the remaining allegations.

118. SB 90 and statutes speak for themselves. Intervenors lack sufficient knowledge to admit or deny the remaining allegations.

119. This is a legal argument that requires no response.

120. Denied.

121. The first two sentences are denied. The legislative history of SB 90 and quotations speak for themselves. According to Justice Stevens' lead opinion in *Cranford v. Marion County Election Board*, the "risk of voter fraud" is "real," voter fraud "could affect the outcome of a close election," and "[t]here is no question about the legitimacy or importance of the State's interest" in combatting it. 553 U.S. 181, 196 (2008); *see also Greater Birmingham Ministries v. Sec'y of State for Ala.*, 992 F.3d 1299, 1334 (11th Cir. 2021) ("[D]eterring voter fraud is a legitimate policy on which to enact an election law, even in the absence of any record evidence of voter fraud."); *Common Cause/Ga. v. Billups*, 554 F.3d 1340, 1353 (11th Cir. 2009) ("Georgia has an interest in preventing election fraud").

122. Denied.

123. SB 90 speaks for itself.

124. Intervenors lack sufficient information to admit or deny these allegations.

125. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny these allegations.

126. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny these allegations.

127. Florida law speaks for itself.

128. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny these allegations.

129. The first sentence is denied. Statutes speak for themselves.

130. This is a legal argument that requires no response.

131. Intervenors lack sufficient knowledge to admit or deny this allegation.

132. Intervenors lack sufficient knowledge to admit or deny this allegation.

133. Denied.

134. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny these allegations.

135. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny these allegations.

136. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny these allegations.

137. Denied.

138. Denied.

139. Denied.

140. SB 90 speaks for itself.

141. The first sentence is denied. Because Plaintiffs cite nothing, Intervenors lack sufficient information to admit or deny the remaining allegations.

142. The legislative history of SB 90 and quotations speak for themselves.

143. The legislative history of SB 90 and quotations speak for themselves.

144. Denied.

145. Data speak for themselves.

146. Florida law speaks for itself.

147. Florida law speaks for itself.

148. Statements and quotations speak for themselves.

149. The first sentence is denied. SB 90 and statutes speak for themselves. The remaining allegations consist of legal arguments that require no response.

150. The first two sentences are denied. The legislative history of SB 90, SB 90, and quotations speak for themselves. The remaining allegations consist of legal arguments that require no response.

151. The first two sentences and the final sentence are denied. SB 90 speaks for itself. Intervenors lack sufficient information to admit or deny the remaining allegations.

152. The cited reports speak for themselves. Because Plaintiffs cite nothing in the remaining allegations, Intervenors lack sufficient information to admit or deny these allegations.

153. The first and last sentences are denied. Intervenors lack sufficient information to admit or deny the remaining allegations.

154. Intervenors lack sufficient information to admit or deny these allegations.

155. Florida law speaks for itself.

156. Florida law speaks for itself.

157. SB 90 speaks for itself. The remaining allegations consist of legal arguments that require no response.

158. Intervenors lack sufficient information to admit or deny these allegations. Quotations speak for themselves.

159. Quotations speak for themselves.

160. The legislative history of SB 90 speaks for itself.

161. Denied.

162. Denied.

163. This is a legal argument that requires no response.

164. Denied.

FIRST CLAIM FOR RELIEF

165. Intervenors repeat and reallege their responses to each allegation contained in the preceding paragraphs.

166. The Voting Rights Act speaks for itself.

167. Denied.

168. Denied.

169. Denied.

170. This legal argument requires no response.

171. Denied.

172. This legal argument requires no response.

SECOND CLAIM FOR RELIEF

173. Intervenors repeat and reallege their responses to each allegation contained in the preceding paragraphs.

174. 42 U.S.C. §1983 speaks for itself.

175. The Equal Protection Clause speaks for itself.

176. Denied.

177. Denied.

178. Denied.

THIRD CLAIM FOR RELIEF

179. Intervenors repeat and reallege their responses to each allegation contained in the preceding paragraphs.

180. 42 U.S.C. §1983 speaks for itself.

181. The Fifteenth Amendment of the United States Constitution speaks for itself.

182. Denied.

FOURTH CLAIM FOR RELIEF

183. Intervenors repeat and reallege their responses to each allegation contained in the preceding paragraphs.

184. 42 U.S.C. §1983 speaks for itself.

185. The First and Fourteenth Amendments to the United States Constitution speak for themselves.

186. The cited authority speaks for itself.

187. The cited authority speaks for itself.

188. The cited authority speaks for itself.

189. Denied.

190. Denied.

FIFTH CLAIM FOR RELIEF

191. Intervenors repeat and reallege their responses to each allegation contained in the preceding paragraphs.

192. 42 U.S.C. §1983 speaks for itself.

193. Admitted.

194. Intervenors lack sufficient information to admit or deny this allegation.

195. Intervenors lack sufficient information to admit or deny this allegation.

196. Denied.

197. Denied.

198. Denied.

199. The cited authorities speak for themselves.

200. The first sentence is denied. Intervenors lack sufficient information to admit or deny the remaining allegations.

201. Denied.

202. Denied.

203. The cited authorities speak for themselves.

204. The cited authorities speak for themselves.

205. The cited authority speaks for itself.

206. SB 90 speaks for itself. The remaining allegations consist of legal argument that does not require a response.

207. This legal argument requires no response.

208. Denied.

209. Denied.

210. These legal arguments require no response

SIXTH CLAIM FOR RELIEF

211. Intervenors repeat and reallege their responses to each allegation contained in the preceding paragraphs.

212. 42 U.S.C. §1983 speaks for itself.

213. The Voting Rights Act speaks for itself.

214. Denied.

215. SB 90 speaks for itself. The remaining allegations consist of legal argument that does not require a response.

216. SB 90 speaks for itself. The remaining allegations consist of legal argument that does not require a response.

217. Denied.

218. These legal arguments require no response.

SEVENTH CLAIM FOR RELIEF

219. Intervenors repeat and reallege their responses to each allegation contained in the preceding paragraphs.

220. 42 U.S.C. §1983 speaks for itself.

221. Admitted.

222. Intervenors lack sufficient information to admit or deny these allegations.

223. This legal argument requires no response. To the extent it requires a response, Intervenors lack sufficient information to admit or deny these allegations.

224. The cited authorities speak for themselves.

225. The first sentence is denied. Intervenors lack sufficient information to admit or deny the remaining allegations.

226. Denied.

227. Denied.

228. Denied.

229. Denied.

230. This legal argument requires no response.

231. Denied.

232. The cited authorities speak for themselves.

233. Denied.

234. This legal argument requires no response.

235. Denied.

236. Denied.

EIGHTH CLAIM FOR RELIEF

237. Intervenors repeat and reallege their responses to each allegation contained in the preceding paragraphs.

238. 42 U.S.C. §1983 speaks for itself.

239. Admitted.

240. Intervenors lack sufficient information to admit or deny these allegations.

241. This legal argument requires no response. To the extent it requires a response, Intervenors lack sufficient information to admit or deny these allegations.

242. The cited authorities speak for themselves.

243. Denied.

244. Denied.

245. Denied.

246. Denied.

247. Denied.

248. This legal argument requires no response.

249. The cited authorities speak for themselves.

250. The first sentence is denied. Intervenors lack sufficient information to admit or deny the remaining allegations.

251. The first sentence is denied. Intervenors lack sufficient information to admit or deny the remaining allegations.

252. Denied.

RESPONSE TO PRAYER FOR RELIEF

Intervenors deny that Plaintiffs are entitled to any of relief requested in the “WHEREFORE” clause of the complaint.

AFFIRMATIVE DEFENSES

1. The allegations in the complaint fail to state a claim.
2. Plaintiffs’ requested relief is barred by the *Purvell* principle.

Dated: July 23, 2021

Tyler Green*
Cameron T. Norris*
Steven C. Begakis*
Daniel Shapiro
Fla. Bar No. 1011108
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423
tyler@consovoymccarthy.com
cam@consovoymccarthy.com
steven@consovoymccarthy.com
daniel@consovoymccarthy.com

**pro hac vice*

Respectfully submitted,

/s/ Daniel E. Nordby
Daniel E. Nordby
Fla. Bar No. 14588
Benjamin J. Gibson
Fla. Bar No. 58661
George N. Meros, Jr.
Fla. Bar No. 263321
Amber Stoner Nunnally
Fla. Bar No. 109281
SHUTTS & BOWEN LLP
215 South Monroe Street, Suite 804
Tallahassee, Florida 32301
Tel: (850) 241-1717
dnordby@shutts.com
bgibson@shutts.com
gmeros@shutts.com
anunnally@shutts.com
mmontanaro@shutts.com

*Counsel for Intervenor-Defendants Republican National Committee and
National Republican Senatorial Committee*

CERTIFICATE OF SERVICE

I certify that on July 23, 2021, I electronically filed this document via ECF, which will serve everyone requiring service.

/s/ Daniel E. Nordby