UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

LEAGUE OF WOMEN VOTERS OF FLORIDA, INC., et al.,

Plaintiffs,

v.

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

Defendants,

and

REPUBLICAN NATIONAL COMMITTEE, and NATIONAL REPUBLICAN SENATORIAL COMMITTEE,

Intervenor-Defendants.

Cases Consolidated for Trial:

Nos.: 4:21-cv-186-MW/MAF
4:21-cv-187-MW/MAF
4:21-cv-201-MW/MAF
4:21-cv-242-MW/MAF

**PLAINTIFFS' JOINT BRIEF IN RESPONSE TO COURT'S ORDER REQUESTING BRIEFING ON SPECIFIC QUESTIONS RELATED TO *ANDERSON-BURDICK***

Pursuant to the Court's Order for Briefing on *Anderson-Burdick* (ECF No. 542), Plaintiffs in the above-captioned consolidated cases respond to the Court's specific questions as follows[1]:

**FIRST QUESTION (ECF No. 542 at 1-2): What is the best controlling authority from the U.S. Supreme Court or the Eleventh Circuit addressing how courts define "reasonable, nondiscriminatory restrictions," as that term is used in *Burdick v. Takushi*, 504 U.S. 428, 434 (1992), and *Anderson v. Celebrezze*, 460 U.S. 780, 788 (1983). In other words, to decide if a law is nondiscriminatory, do courts look to the language of the law, the intent behind the law, or the impact that the law has on certain groups?**

A law can be discriminatory under the *Anderson-Burdick* test if its language makes it discriminatory, if it was intended to be discriminatory, *or* if it has a disparate impact on certain groups.

First, a law that places a disparate burden on identifiable groups is not a reasonable, nondiscriminatory restriction, even if there is no discriminatory language or evidence of discriminatory intent:

- ***Bush v. Gore*, 531 U.S. 98 (2000):** "Having once granted the right to vote on equal terms, the State may not, by later arbitrary and disparate treatment, value one person's vote over that of another." *Id.* at 104-05.

- ***Anderson v. Celebrezze*, 460 U.S. 780 (1983)**: A candidate-filing deadline applicable to all presidential candidates not nominated by a major party was not a reasonable, nondiscriminatory restriction because it "place[d] a particular burden on an identifiable segment of Ohio's independent-minded voters." *Id.* at 792-94. The Court held "it is especially difficult for the State to justify a restriction that limits political participation by an identifiable political group whose members share a particular viewpoint, associational preference, or economic status." It further explained that "[a] burden that falls unequally on new or small political parties or on independent candidates impinges, by

[1] In this joint filing, Plaintiffs address only the specific questions asked by the Court, with the brevity requested by the Court. Plaintiffs do not address other aspects of *Anderson-Burdick* or any issues related to other claims not specifically addressed or implicated by the Court's questions.

its very nature, on associational choices protected by the First Amendment. It discriminates against those candidates and—of particular importance—against those voters whose political preferences lie outside the existing political parties." *Id.* In reaching these conclusions about disparate burdens, the Court did not point to any evidence of discriminatory intent or to any discriminatory language in the law itself.

- ***Tashjian v. Republican Party of Connecticut*, 479 U.S. 208 (1986):** Citing *Anderson* and holding that Connecticut's longstanding, facially-neutral statute requiring closed primaries violated the First Amendment because it interfered with the Republican Party's new plan to conduct an open primary, and thereby inhibited the Party's freedom of association without a commensurately weighty state interest. *Id.* at 225. The Court reached this conclusion even though such an effect could not have been the intention of the statute, which had been enacted decades before the Republican Party sought to conduct such a primary. *Id.* at 211-12.

- ***Jones v. DeSantis*, 15 F.4th 1062 (11th Cir. 2021):** In the *Anderson-Burdick* context, plaintiffs "need not demonstrate discriminatory intent behind the challenged provision." *Id.* at 1065-66.

- ***Swanson v. Worley*, 490 F.3d 894 (11th Cir. 2007):** Holding that Alabama's June filing deadline "is a nondiscriminatory restriction" under *Anderson-Burdick*, because it "does not place independent and minor party candidates at a relative disadvantage to major party candidates." *Id.* at 908-09. This reasoning recognizes that "non-discriminatory" in the *Anderson-Burdick* context includes not imposing disparate burdens.

Second, a law with text that facially discriminates against particular candidates or groups is not a reasonable, non-discriminatory restriction:

- ***Cook v. Gralike*, 531 U.S. 510 (2001):** The Supreme Court, citing *Anderson*, invalidated an election law that required placing pejorative labels ("DISREGARDED VOTERS' INSTRUCTIONS ON TERM LIMITS" or "DECLINED TO PLEDGE TO SUPPORT TERM LIMITS") next to candidates who did not support a term limit constitutional amendment. *Id.* Based on the text alone (rather than any other evidence of legislative intent), the Court concluded that the law was "plainly designed to favor candidates who are willing to support the particular form of a term limits amendment set forth in its text and to disfavor those who either oppose term limits entirely or would prefer a different proposal." *Id.* at 524-25.

Third, a law passed with the intent to discriminate against particular groups cannot qualify as a reasonable, nondiscriminatory restriction under *Anderson-Burdick*. If such a law discriminates on the basis of race, it also violates the Fifteenth Amendment:

- ***City of Mobile v. Bolden*, 446 U.S. 55 (1980):** "[A]ction by a state that is racially neutral on its face violates the Fifteenth Amendment only if motivated by a discriminatory purpose." *Id.* at 62.

**What are the best non-controlling persuasive cases on the same question?**

Disparate burden suffices; there is no requirement of discriminatory text or intent:

- ***Democratic Executive Committee of Florida v. Lee*, 915 F.3d 1312 (11th Cir. 2019):** In a stay-panel opinion, the Eleventh Circuit explained that "[t]o establish an undue burden on the right to vote under the *Anderson-Burdick* test, Plaintiffs need not demonstrate discriminatory intent behind the signature-match scheme or the notice provisions because we are considering the constitutionality of a generalized burden on the fundamental right to vote, for which we apply the *Anderson-Burdick* balancing test instead of a traditional equal-protection inquiry." *Id.* at 1319.[2]

- ***Hussey v. City of Portland*, 64 F.3d 1260 (9th Cir. 1995):** Applying *Anderson-Burdick*, the Ninth Circuit held that a generally applicable and facially neutral law was nevertheless unreasonable and discriminatory because, by conditioning a sewer-fee subsidy on a landowner voting for annexation to the City of Portland, the law "disproportionately affects the poor" and "unreasonably interferes" with their right to vote. *Id.* at 1266. The court so concluded without identifying any evidence of a discriminatory intent. *See id.*

- ***Vote Forward v. DeJoy*, 490 F. Supp. 3d 110 (D.D.C. 2020):** U.S. Postal Service policy changes that adversely affected voters who cast vote-by-mail ballots did not pass the *Anderson-Burdick* test in part because the changes, "while content neutral, . . . place an especially severe burden on voters who

[2] The Eleventh Circuit has held that "the necessarily tentative and preliminary nature of a stay-panel opinion precludes the opinion from having an effect outside that case." *Democratic Exec. Comm. of Fla. v. Nat'l Republican Senatorial Comm.*, 950 F.3d 790, 795 (11th Cir. 2020).

have no other reasonable choice than to vote by mail," such as voters with disabilities. *Id.* at 116-18, 121-28.

- ***North Carolina State Conference of NAACP v. McCrory*, 831 F.3d 204 (4th Cir. 2016):** Citing *Anderson* for proposition that the legislature cannot "restrict access to the franchise based on the desire to benefit a certain political party," and holding that "intentionally targeting a particular race's access to the franchise because its members vote for a particular party, in a predictable manner, constitutes discriminatory purpose." *Id.* at 222-23.

A law passed with the intention of discriminating against particular groups also is not a reasonable, nondiscriminatory restriction:

- ***North Carolina State Conference of NAACP v. McCrory*, 831 F.3d 204 (4th Cir. 2016):** Citing *Anderson* for the proposition that the legislature cannot "restrict access to the franchise based on the desire to benefit a certain political party." *Id.* at 222-23.

**SECOND QUESTION (ECF No. 542 at 2): What is the best controlling authority from the U.S. Supreme Court or the Eleventh Circuit addressing whether, when considering the burdens SB 90 imposes under *Anderson-Burdick*, this Court considers the challenged provisions together and the cumulative burdens the provisions impose, *or* this Court considers the challenged provisions separately and the burdens they impose in isolation?**

Where plaintiffs challenge multiple election-law provisions that have a cumulative or interlocking effect, the court must consider the cumulative burdens that the provisions, together, impose:

- ***Williams v. Rhodes*, 393 U.S. 23 (1968):** The Supreme Court invalidated Ohio's "series of election laws" governing the presidential ballot, explaining that "[*t*]*ogether*, these various restrictive measures make it virtually impossible for any party to qualify on the [presidential election] ballot except the Republican and Democratic Parties." *Id.* at 24-25 (emphasis added).

**What are the best non-controlling persuasive cases on the same question?**

- ***Clingman v. Beaver*, 544 U.S. 581 (2005) (O'Connor, J., concurring in part and concurring in the judgment):** "A realistic assessment of regulatory burdens on associational rights would, in an appropriate case, require examination of the cumulative effects of the State's overall scheme governing

primary elections; and any finding of a more severe burden would trigger more probing review of the justifications offered by the State." *Id.* at 599.

- ***Graveline v. Benson*, 992 F.3d 524 (6th Cir. 2021):** In the context of an *Anderson-Burdick* claim, the Sixth Circuit held that "[w]hen plaintiffs allege that a statutory scheme, in combination, imposes a burden on their rights, we must consider 'the combined effect of the applicable election regulations,' and not measure the effect of each statute in isolation." *Id.* at 536 (quoting *Libertarian Party of Ohio v. Blackwell*, 462 F.3d 579, 586 (6th Cir. 2006)).

- ***Esshaki v. Whitmer*, 813 F. App'x 170 (6th Cir. 2020)**: Applying *Anderson-Burdick*, the Sixth Circuit held that "the combination of" challenged Michigan regulations—specifically, "the State's strict enforcement of the ballot-access provisions" and its COVID-19 stay-at-home order—"imposed a severe burden on the plaintiffs' ballot access" and thus "violated the First Amendment." *Id*. at 171.

- ***Republican Party of Arkansas v. Faulkner County, Arkansas*, 49 F.3d 1289 (8th Cir. 1995):** The Eighth Circuit invalidated two ballot-access provisions under *Anderson-Burdick* because "the combined effect of these requirements impermissibly burdens the First and Fourteenth Amendment associational rights of voters and of the Republican Party." *Id.* at 1291**.** The court emphasized that it was not holding that either provision alone was unconstitutional, but only that "the burdens placed on voters and parties by the interaction of the two requirements render the provisions unconstitutional in combination." *Id.*

- ***Tennessee State Conference of NAACP v. Hargett*, 420 F. Supp. 3d 683 (M.D. Tenn. 2019):** In an *Anderson-Burdick* challenge, holding that each challenged provision was unconstitutional standing alone and then that the challenged provisions "functioning together, create a cumulative burden that is even more difficult to justify as a constitutional matter." *Id.* at 710.

While the court must consider the combined burden of the challenged laws, the court's *Anderson-Burdick* analysis must focus on the effect of the challenged laws, specifically. The existence of other methods of voting does not eliminate the burden from restrictions on one method of voting:

- ***Democratic Executive Committee of Florida v. Lee*, 915 F.3d 1312 (11th Cir. 2019):** The Eleventh Circuit held, in a stay-panel decision, that signature matching and cure procedures applicable only to voters who voted by mail or

with provisional ballots "impose[d] at least a serious burden on the right to vote," because those procedures "subject[ed] vote-by-mail and provisional electors to the risk of disenfranchisement," even though alternatives to voting by mail were available under Florida law. *Id.* at 1319-21.[3]

Respectfully submitted this 7th day of February, 2022.

/s/ Frederick S. Wermuth
Frederick S. Wermuth
Florida Bar No. 0184111
Thomas A. Zehnder
Florida Bar No. 0063274
King, Blackwell, Zehnder
& Wermuth, P.A.
P.O. Box 1631
Orlando, FL 32802-1631
Telephone: (407) 422-2472
Facsimile: (407) 648-0161
fwermuth@kbzwlaw.com
tzehnder@kbzwlaw.com

Marc E. Elias
Elisabeth Frost
David R. Fox*
Lalitha D. Madduri*
Christina A. Ford
Francesca Gibson*
Elias Law Group LLP
10 G St. NE, Suite 600
Washington, D.C. 20002
Telephone: (202) 968-4490
melias@elias.law
efrost@elias.law
dfox@elias.law
lmadduri@elias.law
cford@elias.law
fgibson@elias.law

/s/ P. Benjamin Duke
P. Benjamin Duke*
Shira M. Poliak*
Covington & Burling LLP
620 Eighth Avenue
New York, NY 10018
Telephone: 212-841-1270
pbduke@cov.com
spoliak@cov.com

Benjamin L. Cavataro
Florida Bar No. 113534
Morgan E. Saunders*
Michael A. Fletcher II*
Elizabeth T. Fouhey*
Cyrus Nasseri*
Covington & Burling LLP
850 Tenth Street, N.W.
Washington, DC 20001
Telephone: 202-662-5693
bcavataro@cov.com
msaunders@cov.com
mfletcher@cov.com
efouhey@cov.com
cnasseri@cov.com

Robert D. Fram*
Ellen Y. Choi*
Nia Joyner**
Covington & Burling LLP
415 Mission Street

[3] *See* footnote 2 regarding the precedential effect of a stay-panel decision.

*Admitted *Pro Hac Vice*

*Counsel for Plaintiffs*

San Francisco, CA 94105
Telephone: 415-591-7025
rfram@cov.com
echoi@cov.com
njoyner@cov.com

Michael Pernick*
Morenike Fajana*
Romane Paul*
NAACP Legal Defense & Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10006
Telephone: 212-965-2200
mfajana@naacpldf.org

Amia Trigg*
Mahogane D. Reed*
NAACP Legal Defense & Educational Fund, Inc.
700 14th Street NW, Ste. 600,
Washington, DC 20005
Telephone: 202-682-1300
atrigg@naacpldf.org

Nellie L. King
Fla. Bar No. 0099562
The Law Offices of Nellie L. King, P.A.
319 Clematis Street, Suite 107
West Palm Beach, FL 33401
Telephone: 561-833-1084
Nellie@CriminalDefenseFla.com

**Admitted pro hac vice*

*Counsel for NAACP Plaintiffs*

/s/ John A. Freedman
Kira Romero-Craft
Florida Bar No. 49927

/s/ Michelle Kanter Cohen
Nancy G. Abudu
Florida Bar No. 111881

Miranda Galindo *
LatinoJustice, PRLDEF
523 W Colonial Dr.
Orlando, FL 32804
Telephone: 321-418-6354
Kromero@latinojustice.org
Mgalindo@latinojustice.org

Brenda Wright *
DEMOS
80 Broad St, 4th Flr
New York, NY 10004
Telephone: 212-633-1405
bwright@demos.org

Judith B. 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
Telephone: 202-728-9557
Jbrowne@advancementproject.org
Gdaniels@advancementproject.org
Jvasquez@advancementproject.org
Skhan@advancementproject.org
Esegarra@advancementproject.org
Sscott@advancementproject.org

John A. Freedman*
Jeremy C. Karpatkin
Elisabeth S. Theodore*
Janine M. Lopez*
Leslie C. Bailey*
Sam I. Ferenc*
Arnold & Porter Kaye Scholer LLP

Caren Short*
Jack Genberg*
Southern Poverty Law Center
P.O. Box 1287
Decatur, Ga 30031-1287
Telephone: 404-521-6700
Fax: 404-221-5857
nancy.abudu@splcenter.org
caren.short@splcenter.org
jack.genberg@splcenter.org

Michelle Kanter Cohen*
Jon Sherman*
Cecilia Aguilera*
Fair Elections Center
1825 K Street NW, Suite 450
Washington, DC 20006
Telephone: 202-331-0114
mkantercohen@fairelectionscenter.org
jsherman@fairelectionscenter.org
caguilera@fairelectionscenter.org

Debra A. Dandeneau
Florida Bar No. 0978360
William H. Devaney*
Baker McKenzie LLP
452 Fifth Avenue
New York, NY 10018
Telephone: (212) 626-4100
debra.dandeneau@bakermckenzie.com
william.devaney@bakermckenzie.com

**Admitted Pro Hac Vice*

*Counsel for HTFF Plaintiff*

601 Massachusetts Ave., NW
Washington, D.C. 20001-3743
Telephone: 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
Telephone: 650-319-4500
Jeffrey.Miller@arnoldporter.com

Aaron Stiefel*
Daniel R. Bernstein*
Ryan D. Buhdu*
Andrew R. Hirschel*
Arnold & Porter Kaye Scholer LLP
250 West 55th Street
New York, NY 10019-9710
Telephone: 212-836-8000
Aaron.Stiefel@arnoldporter.com
Daniel.Bernstein@arnoldporter.com
Ryan.Budhu@arnoldporter.com
Andrew.Hirshel@arnoldporter.com

**Admitted pro hac vice*

*Counsel for Florida Rising Plaintiffs*

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 7, 2022 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel in the Service List below.

/s/ Frederick S. Wermuth
Frederick S. Wermuth
Florida Bar No. 0184111

*Counsel for League Plaintiffs*

## SERVICE LIST

Bradley R. McVay
Ashley E. Davis
Colleen E. O'Brien
William D. Chappell
Florida Department of State
RA Gray Building
500 South Bronough Street, Ste. 100
Tallahassee, FL 32399
Telephone: 850-245-6531
brad.mcvay@dos.myflorida.com
ashley.davis@dos.myflorida.com
colleen.obrien@dos.myflorida.com
david.chappell@dos.myflorida.com

Mohammad O. Jazil
Gary V. Perko
Holzman Vogel Baran Torchinsky & Josefiak PLLC
119 S. Monroe Street, Suite 500
Tallahassee, FL 32301
Telephone: 850-567-5762
mJazil@holtzmanvogel.com

William H. Stafford, III
Bilal A. Faruqui
Karen A. Brodeen
Rachel R. Siegel
William Chorba
Office of the Attorney General
PL-01 The Capitol
Tallahassee, Florida 32399
Telephone: 850-414-3785
william.stafford@myfloridalegal.com
bilal.faruqui@myfloridalegal.com
karen.brodeen@myfloridalegal.com
rachel.siegel@myfloridalegal.com
william.chorba@myfloridalegal.com

*Counsel for Defendant Ashley Moody*

gperko@holtzmanvogel.com

Phillip M. Gordon
Kenneth C. Daines
Holzman Vogel Baran Torchinsky &
Josefiak PLLC
15405 John Marshall Hwy.
Haymarket, VA 20169
Telephone: 540-341-8808
pgordon@holtzmanvogel.com
kdaines@holtzmanvogel.com

*Counsel for Defendant Laurel M. Lee*

Robert C. Swain
Diana M. Johnson
Alachua County Attorney's Office
12 SE First St.
Gainesville, FL 32602
Telephone: 352-374-5218
bswain@alachuacounty.us
dmjohnson@alachuacounty.us

*Counsel for Defendant Kim A. Barton*

Edward P. Cuffe
Susan Erdelyi
Marks Gray, P.A.
1200 Riverplace Blvd, Ste. 800
Jacksonville, FL 32207
Telephone: 904-807-2110
sse@marksgray.com
pcuffe@marksgray.com

*Counsel for Defendants Christopher Milton, Mark Anderson, Amanda Seyfang, Sharon Chason, Tomi S. Brown, Starlet Cannon, Heather Riley, Shirley Knight, Laura Hutto, Carol Dunaway, Travis Hart, Grant Conyers, Janet Adkins, Charles Overturf, Tappie Villane, Vicky Oakes, William Keen, Jennifer Musgrove, Dana Southerland, Deborah Osborne, Joseph Morgan, Bobby Beasley and Carol Rudd*

Frank M. Mari
John M. Janousek
Roper, P.A.
2707 E. Jefferson St.
Orlando, FL 32803

Ronald A. Labasky
Brewton Plante PA
215 S. Monroe Street, Ste. 825
Tallahassee, FL 32301
Telephone: 850-222-7718

Telephone: 407-897-5150
fmari@roperpa.com
jjanousek@roperpa.com

*Counsel for Defendants Mark Negley, Connie Sanchez, John Hanlon, Marty Bishop, Heath Driggers, Lori Scott, Kaiti Lenhart, and Penny Ogg*

rlabasky@bplawfirm.net

John T. LaVia
Gardner, Bist, Bowden, Bush, Dee, Lavia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32308
Telephone: 850-385-0070
jlavia@gbwlegal.com

*Counsel for Defendants Chris H. Chambless, Vicki Davis, Mary Jane Arrington, Gertrude Walker and Lori Edwards*

Andy V. Bardos
James T. Moore, Jr.
GrayRobinson PA
301 S. Bronough St, Ste. 600
Tallahassee, FL 32301
Telephone: 850-577-9090
andy.bardos@gray-robinson.com
tim.moore@gray-robinson.com

*Counsel for Defendant Jennifer J. Edwards, Leslie Swan, Alan Hays, Tommy Doyle, Michael Bennett, Wesley Wilcox, Joyce Griffin, Brian Corley, Christopher Anderson and Paul Stamoulis*

Stephen M. Todd
Office of The County Attorney
601 E. Kennedy Blvd., 27th Floor
Tampa, FL 33602
Telephone: 813-272-5670
todds@hillsboroughcounty.org

*Counsel for Defendant Craig Latimer*

Jon A. Jouben
Kyle J. Benda
Hernando County
20 N. Main Street, Ste. 462
Brookesville, FL 34601-2850
Telephone: 351-754-4122
jjouben@co.hernando.fl.us
kbenda@co.hernando.fl.us

Kelly L. Vicari
Jared D. Kahn
Pinellas County Attorney's Office
315 Court Street, 6th Floor
Clearwater, FL 33756
Telephone: 727-464-3354
kvicari@pinellascounty.org
jkahn@pinellascounty.org

*Counsel for Defendant Shirley Anderson*

Matthew R. Shaud
Escambia County Attorneys Office
221 Palafox Place, Ste. 430
Pensacola, FL 32502
Telephone: 850-595-4970
mrshaud@myescambia.com

*Counsel for Defendant David H. Stafford*

Dale Scott
Bell & Roper, P.A.
2707 E. Jefferson St.
Orlando, Florida 32803
Telephone: 407-897-5150
dscott@bellroperlaw.com

*Counsel for Defendant Maureen Baird*

Robert Shearman
Geraldo F. Olivo
Henderson, Franklin, Starnes & Holt, P.A.
1715 Monroe Street
Ft. Myers, Florida 33901
Telephone: 239-334-1346
robert.shearman@henlaw.com
jerry.olivo@henlaw.com

*Counsel for Defendants Aletris Farnam, Diane Smith, Brenda Hoots,*

*Counsel for Defendant Julie Marcus*

Benjamin Salzillo
Nathaniel A. Klitsberg
Joseph K. Jarone
Brendalyn V.A. Edwards
115 South Andrews Ave., Ste. 423
Ft. Lauderdale, FL 33301
Telephone: 954-357-7600
bsalizzo@broward.org
nklitsberg@broward.org
jkjarone@broward.org
breedwards@broward.org

*Counsel for Defendant Joe Scott*

Craig D. Feiser
Jason Teal
Mary Margaret Giannini
117 W. Duval Street, Suite 480
Jacksonville, Florida 32202
Telephone: 904-255-5052
cfeiser@coj.net
mgiannini@coj.net

*Counsel for Defendant Mike Hogan*

Mark Herron
S. Denay Brown
Patrick O'Bryant
Messer Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, Florida 32308
Telephone: 850-222-0720
mherron@lawfla.com
dbrown@lawfla.com
pobryant@lawfla.com

*Counsel for Defendant Mark Earley*

*Therisa Meadows, Tammy Jones and Melissa Arnold*

Gregory T. Stewart
Elizabeth D. Ellis
Kirsten H. Mood
Nabors, Giblin & Nickerson, P.A.
1500 Mahan Drive, Suite 200
Tallahassee, FL 32308
Telephone: 850-224-4070
gstewart@ngnlaw.com
eellis@ngnlaw.com
kmood@ngnlaw.com

*Counsel for Defendant Paul Lux*

W. Kevin Bledsoe
London L. Ott
123 W. Indiana Avenue, Room 301
Deland, Florida 32720
Telephone: 386-736-5950
kbledsoe@volusia.org
lott@volusia.org

*Counsel for Defendant Lisa Lewis*

Michael B. Valdes
Oren Rosenthal
Miami-Dade Attorney's Office
Stephen P. Clark Center
111 N.W. 1st Street, Suite 2810
Miami, Florida 33128
Telephone: 305-375-5620
michael.valdes@miamidade.gov
oren.rosenthal@miamidade.gov

*Counsel for Defendant Christine White*

Nicholas Shannin
Shannin Law Firm
214 S. Lucerne Circle East
Orlando, Florida 32801
Telephone: 407-985-2222
nshannin@shanninlaw.com

*Counsel for Defendant Bill Cowles*

Morgan Bentley
Bentley Law Firm, P.A.
783 South Orange Ave., Third Floor
Sarasota, Florida 34236
Telephone: 941-556-9030
mbentley@thebentleylawfirm.com

*Counsel for Defendant Ron Turner*

Ashley D. Houlihan
Palm Beach County Supervisor of Elections
240 S Military Trail
West Palm Beach, FL 33416
Telephone: 561-656-6200
ashleyhoulihan@votepalmbeach.gov

Ronald A. Labasky
Brewton Plante PA
215 S. Monroe Street, Ste. 825
Tallahassee, FL 32301
Telephone: 850-222-7718
rlabasky@bplawfirm.net

*Counsel for Defendant Wendy Link*

Benjamin J. Gibson
Daniel E. Nordby
George N. Meros, Jr.
Amber S. Nunnally
Frank A. Zacherl
Tara R. Price
Shutts & Bowen LLP
215 S. Monroe St., Ste. 804
Tallahassee, FL 32301
Telephone: 850-241-1720
bgibson@shutts.com
dnordby@shutts.com
gmeros@shutts.com
anunnally@shutts.com
fzacherl@shutts.com
tprice@shutts.com

Daniel J. Shapiro
Cameron T. Norris
Tyler R. Green
Steven C. Begakis
Consovoy McCarthy, PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
Telephone: 703-243-9423
daniel@consovoymccarthy.com
cam@consovoymccarthy.com
tyler@consovoymccarthy.com
steven@consovoymccarthy.com

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