

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

FLORIDA STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE
(NAACP), *et al.*,

Civil No. 4:07CV-402-SPM/WCS

Plaintiffs,

vs.

KURT S. BROWNING, in his official capacity as
Secretary of State for the State of Florida,

Defendant.

**REPLY DECLARATION OF GLENN T. BURHANS, JR.
IN SUPPORT OF PLAINTIFFS' REPLY TO THE SECRETARY OF STATE'S
RESPONSE TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Glenn T. Burhans, Jr., hereby declare as follows:

1. I am an attorney at Greenberg Traurig, P.A., counsel for Plaintiffs in this action. I submit this declaration in support of Plaintiffs' Reply to the Secretary of State's Response to Plaintiff's Motion for Preliminary Injunction, and in support of Plaintiffs' Motion for Preliminary Injunction.

2. Attached hereto as Exhibit 1 are Tables Summarizing Examples of Typical Data Entry Errors. Exhibit 1 is filed under seal pursuant to the Protective Order dated October 23, 2007.

3. Attached hereto as Exhibit 2 is the Amended Appendix One to Plaintiffs' Supplemental Submission Concerning Additional Evidence Gained Through Discovery

(including summary tables of data from Defendant on un-matched applicants), which is updated to reflect data produced by the Secretary of State on December 3, 2007.

4. Attached hereto as Exhibit 3 is Data Pertaining to Un-matched Voters Recorded as Having Shown Photo ID to an Election Official, which was extracted without modification from a data file produced by the Secretary of State on December 3, 2007.

5. Attached hereto as Exhibit 4 is Plaintiffs' Designation of Deposition Testimony of Alvaro Fernandez and Beverly Colson Neal.

6. Attached hereto as Exhibit 5 are true and correct copies of the "Voter Registration Year To Date Report" pages for 2006 and 2007, obtained from the website of the Florida Department of State on December 4, 2007, at <http://election.dos.state.fl.us/voterreg/vrReportArchives/2006/December/YTDTTotal.pdf> and <http://election.dos.state.fl.us/voterreg/vrReportArchives/2007/October/YTDTTotal.pdf>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed on December 6, 2007 in Tallahassee, Florida.

GLENN T. BURHANS, JR.

CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that a copy of the foregoing was served via the Court's CM/ECF electronic filing system this day, December 6, 2007, upon the following:

Peter Antonacci
Allen Winsor
Andy V. Bardos
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GREENBERG TRAUIG, P.A.

S/ GLENN T. BURHANS, JR.

GLENN T. BURHANS, JR.

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