

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

DNC SERVICES CORPORATION /
DEMOCRATIC NATIONAL
COMMITTEE, DEMOCRATIC
EXECUTIVE COMMITTEE OF
FLORIDA, DSCC a/k/a DEMOCRATIC
SENATORIAL CAMPAIGN
COMMITTEE, and DCCC a/k/a
DEMOCRATIC CONGRESSIONAL
CAMPAIGN COMMITTEE,

Plaintiffs,

v.

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

Defendant and Defendant-Intervenors.

Case No. 4:18-cv-520 (MW/MJF)

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND TEMPORARY STAY
OF DISCOVERY**

Plaintiffs DNC Services Corporation / Democratic National Committee (the “DNC”), Democratic Executive Committee of Florida (“DECF”), DSCC a/k/a Democratic Senatorial Campaign Committee, and DCCC a/k/a Democratic Congressional Campaign Committee respectfully request a two-week extension of the stay of discovery issued by this Court on May 29, 2019, in light of the recently passed amendments to Fla. Stat. §§ 101.68 and 101.048 (collectively, the “Signature

Match Laws”), which are still awaiting the Governor’s signature. In support of this Motion, Plaintiffs state the following:

On May 29, 2019, the Court granted Plaintiffs’ Unopposed Motion for Temporary Stay of Discovery (“Original Motion”), ECF No. 133, in light of the passage of SB 7066, which includes provisions relevant to this lawsuit. ECF No. 134. Plaintiffs noted in their Original Motion that SB 7066 had yet to be presented to the Governor,¹ and that once presented, the Governor has 15 days to act on the bill.² The Governor has indicated that he intends to sign the bill,³ which will take effect on July 1, 2019.

Because the initial temporary stay expires on June 13, 2019, and SB 7066 has not yet been presented to the Governor,⁴ Plaintiffs request an extension of the stay of discovery in order to avoid unnecessary expenditure of resources until SB 7066 is either signed into law or vetoed by the Governor.

¹ Florida Senate, Bill History, available at: <https://www.flsenate.gov/Session/Bill/2019/07066>

² Fla. Const. art. III, § 8(a).

³ See, e.g., *Amendment 4 Bill: DeSantis says he’s ready to sign*, TAMPA BAY TIMES, (May 8, 2019), <https://www.tampabay.com/florida-politics/buzz/2019/05/08/amendment-4-bill-desantis-says-hes-ready-to-sign/>

⁴ See Florida Senate, Bill History, *supra* note 1.

Counsel for Plaintiffs has conferred with counsel for Defendant and Defendants-Intervenors and all parties have indicated that they do not oppose the requested stay.

WHEREFORE Plaintiffs respectfully request that the Court extend the stay of discovery and all discovery deadlines for an additional two weeks.

Dated: June 13, 2019

Respectfully submitted,

/s/ Uzoma Nkwonta

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LOCAL RULE 7.1(F) CERTIFICATION

I HEREBY CERTIFY that this motion contains 313 words, and complies with the size, font, and formatting requirements of Local Rule 5.1(C).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 13, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Uzoma Nkwonta

Uzoma N. Nkwonta