No. 26-14146

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

CAIR-FOUNDATION, INC., et al.,

Plaintiffs–Appellants,

v.

RON DESANTIS, et al.,

Defendants–Appellees.

On Appeal from the United States District Court
for the Northern District of Florida, No. 4:26-cv-521 (Winsor, J.)

PLAINTIFFS–APPELLANTS' TIME-SENSITIVE MOTION FOR LEAVE TO EXCEED WORD LIMIT

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CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rules 26.1-1 through 26.1-3, Plaintiffs–Appellants certify that the following individuals and entities may have an interest in the outcome of this case or appeal:

1. American Civil Liberties Union Foundation, *Attorney for Plaintiffs–Appellants*
2. American Civil Liberties Union Foundation of Florida, *Attorney for Plaintiffs–Appellants*
3. Bailey, Mark Langenbach, *Attorney for Plaintiffs–Appellants*
4. Bakkedahl, Thomas, *Defendant–Appellee*
5. Bartlett, Bruce, *Defendant–Appellee*
6. Basford, Larry, *Defendant–Appellee*
7. Bondurant, Mixson & Elmore, LLP, *Attorney for Plaintiffs–Appellants*
8. Brodsky, Ed, *Defendant–Appellee*
9. CAIR Florida, Inc., *Plaintiff–Appellant*
10. CAIR-Foundation, Inc., *Plaintiff–Appellant*
11. Campbell, Jack, *Defendant–Appellee*
12. Carlo-Gonzalez, Celin Alejandra, *Attorney for Plaintiffs–Appellants*
13. Cooper & Kirk, PLLC, *Attorney for Defendants–Appellees*
14. Cooper, Charles J., *Attorney for Defendants–Appellees*

15. Cox, Alexcia, *Defendant–Appellee*

16. Craine, Jessica Paige, *Attorney for Defendants–Appellees*

17. DeSantis, Ron, *Defendant–Appellee*

18. Dewhirst, David Morgan Steven, *Attorney for Defendants–Appellees*

19. Durrett, John, *Defendant–Appellee*

20. Fleisher, Aaron Saul, *Attorney for Plaintiffs–Appellants*

21. Florida Attorney General's Department of Legal Affairs' Office of Statewide Prosecution, *Implements Challenged Statutory Regime*

22. Florida Attorney General's Office, *Attorney for Defendants–Appellees*

23. Fox, Amira, *Defendant–Appellee*

24. Gannon, Kayla Polonsky, *Attorney for Plaintiffs–Appellants*

25. Gladson, Bill, *Defendant–Appellee*

26. Gorski, Ashley Marie, *Attorney for Plaintiffs–Appellants*

27. Gustafson, Tyler Evan, *Attorney for Defendants–Appellees*

28. Haas, Brian, *Defendant–Appellee*

29. Hogle, Charles, *Attorney for Plaintiffs–Appellants*

30. Ingoglia, Blaise, *Defendant–Appellee*

31. Keefe, Larry, *Defendant–Appellee*

32. Kramer, Brian, *Defendant–Appellee*

33. Larizza, R.J., *Defendant–Appellee*

34. Lopez, Susan, *Defendant–Appellee*

35. Madden, Ginger Bowden, *Defendant–Appellee*

36. McCoy, Scott D., *Attorney for Plaintiffs–Appellants*

37. Moss, Nicole Jo, *Attorney for Defendants–Appellees*

38. Muehlhoff, Jason John, *Attorney for Defendants–Appellees*

39. Nelson, Melissa, *Defendant–Appellee*

40. Pryor, Harold, *Defendant–Appellee*

41. Ramer, John Duross, *Defendant–Appellee*

42. Rundle, Katherine Fernandez, *Defendant–Appellee*

43. Scheiner, William, *Defendant–Appellee*

44. Shamsi, Hina, *Attorney for Plaintiffs–Appellants*

45. Simmons, Mary Ella Wright, *Attorney for Plaintiffs–Appellants*

46. Simpson, Wilton, *Defendant–Appellee*

47. Smith, Natalie Grace Mary, *Attorney for Plaintiffs–Appellants*

48. Soto, Diego Armando, *Attorney for Plaintiffs–Appellants*

49. Southern Poverty Law Center, *Attorney for Plaintiffs–Appellants*

50. Tilley, Daniel Boaz, *Attorney for Plaintiffs–Appellants*

51. Toomey, Patrick Christopher, *Attorney for Plaintiffs–Appellants*

52. Uthmeier, James, *Defendant–Appellee*

53. Varghese, Manoj Sam “Sachin,” *Attorney for Plaintiffs–Appellants*

54. Walters, Riley William, *Attorney for Defendants–Appellees*

55. Ward, Dennis, *Defendant–Appellee*

56. Winsor, Hon. Allen, *District Court Judge for the Northern District of Florida and District Court Judge in the Above-Captioned Case*

57. Worrell, Monique, *Defendant–Appellee*

Plaintiffs–Appellants further state that no publicly traded company or corporation has an interest in the outcome of the case or appeal. Plaintiffs–Appellants certify that neither CAIR-Foundation, Inc. nor CAIR Florida, Inc. has a parent corporation, and no publicly held corporation owns 10% or more of CAIR-Foundation, Inc.'s or CAIR Florida, Inc.'s stock.

Dated: November 10, 2026

/s/ Ashley Gorski
Ashley Gorski
American Civil Liberties Union Foundation

Attorney for Plaintiffs–Appellants

TIME-SENSITIVE MOTION FOR LEAVE TO EXCEED WORD LIMIT

Pursuant to Federal Rule of Appellate Procedure 27(d)(2), Plaintiffs–Appellants respectfully request permission to exceed, by 2,750 words, the 5,200-word limit for their time-sensitive motion for an injunction pending appeal. Plaintiffs seek to enjoin, pending appeal, their designations as "domestic terrorist organizations" or "DTOs," and the enforcement of Florida Statutes Sections 617.1420, 775.30, 775.33, 775.34, 874.03 (and the related "criminal gang" provisions in Sections 823.05 and 874.04-12), and 943.03102, and Florida Department of Law Enforcement Emergency Rule 11RER26-8, insofar as they concern "DTOs" ("DTO regime").

The district court's opinion largely denying Plaintiffs' motion for a preliminary injunction spans 36 pages and addresses several complex constitutional and statutory issues. Indeed, the statutory designation scheme at issue is brand new, triggers a cascade of separate prohibitions and penalties under Florida law, has no precedent as the district court observed, *see* App.6, and has never before been interpreted by a court. To fully address the errors in the district court's opinion, and in light of the complex statutory regime and constitutional questions at issue and Plaintiffs' urgent need for relief, Plaintiffs respectfully submit that 2,750 additional words are necessary and will aid the Court's consideration of their motion for an injunction pending appeal. Plaintiffs have

endeavored to shorten their motion as much as possible prior to making this request.

Defendants–Appellees do not oppose this motion to extend the word limit, and Plaintiffs would not oppose the same extension of the word limit for Defendants–Appellees' response to Plaintiffs' motion for an injunction pending appeal.

Accordingly, Plaintiffs respectfully request to file a motion of up to 7,950 words for an injunction pending appeal.

Dated: November 10, 2026

Respectfully submitted,

/s/ Ashley Gorski

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CERTIFICATE OF COMPLIANCE

The undersigned counsel certifies as follows:

1. This motion complies with the word limit of Rule 27(d)(2)(A) of the Federal Rules of Appellate Procedure because, excluding the parts of the document exempted by Rule 32(f), it contains 278 words.

2. This motion complies with the typeface requirements of Rule 32(a)(5) and the type-style requirements of Rule 32(a)(6) because it was prepared using Microsoft Word and is set in 14-point Times New Roman, a proportionally spaced typeface.

Dated: November 10, 2026

/s/ Ashley Gorski
Ashley Gorski
American Civil Liberties Union Foundation

Attorney for Plaintiffs–Appellants