

Exhibit A

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

CAIR-FOUNDATION, INC. and
CAIR-FLORIDA, INC.,

Plaintiffs,

v.

Case No. 4:25-cv-00516-MW-MJF

RONALD DESANTIS, in his official capacity
as Governor, State of Florida,

Defendant.

PLAINTIFFS' AMENDED NOTICE OF RULE 30(B)(6) DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs CAIR-Foundation and CAIR-Florida (“**Plaintiffs**”), through their undersigned counsel, will take the deposition upon oral examination of the Executive Office of the Governor of Florida (“**Governor’s Office**”) in the above captioned action. The deposition will be conducted at 400 South Monroe Street, Tallahassee, Florida 32399 on August 26, 2026, beginning at 9:30 a.m. Eastern Time and to continue thereafter until completed. The deposition shall take place before a Notary Public or other official authorized by law to administer oaths and will be recorded using video, audio, and/or stenographic means. Testimony may also be recorded by real-time transcription means (*e.g.*, LiveNote). The testimony taken pursuant to this Notice of Deposition may be used for any and all appropriate purposes as provided by the Federal Rules of Civil Procedure and Rules of Evidence.

The subject matter of the deposition is set forth in the topics listed below. Pursuant to Rule 30(b)(6), the Governor’s Office is required to designate one or more officers, directors, managing

agents, employees, or other persons who consent and are knowledgeable to testify on its behalf regarding each of the topics listed below. Plaintiffs request that the Governor's Office's counsel provide the identity of each witness who will testify on its behalf, and for each witness identified, the witness's job title and the specific topic(s) from the list of topics set forth below on which that witness will testify, at least ten (10) days in advance of the deposition.

DEPOSITION TOPICS

Topic 1: The Executive Office of the Governor's understanding of, opinion of, and attitude towards CAIR and CAIR-Florida at present and prior to the issuance of Executive Order 25-244.

Topic 2: The Executive Office of the Governor's interactions with CAIR and CAIR-Florida and knowledge of CAIR and CAIR-Florida's advocacy prior to the issuance of Executive Order 25-244, including but not limited to: (a) advocacy surrounding HB 119 introduced in 2025, also known as the "No Shari'a Act," (b) the November 2023 litigation involving a local SJP student organization at the University of South Florida, and (c) the letter CAIR-Florida issued to the Governor in February 2025 regarding his criticism of documented immigrants at a press conference.

Topic 3: The Executive Office of the Governor's general process for researching, drafting, preparing, and promulgating executive orders.

Topic 4: The Executive Office of the Governor's research into and investigation of CAIR and CAIR-Florida prior to the promulgation of Executive Order 25-244, including (a) any sources consulted and (b) any factual findings made.

Topic 5: Communications between the Executive Office of the Governor and any third party concerning the development, promulgation, or enforcement of Executive Order 25-244,

including any research, draft language, or other input, suggestions, or assistance provided.

Topic 6: The Executive Office of the Governor's process for drafting, preparing, and promulgating Executive Order 25-244, including but not limited to: (a) any individuals involved, and the nature of their contributions, (b) any changes or edits made to the language, substance, or effect of the order, (c) any documents or materials reviewed, (d) any facts or information considered, (e) consideration of alternative measures, and (f) any concerns raised, either internally or externally, about Executive Order 25-244.

Topic 7: Communications between the Executive Office of the Governor and any county, municipal, state, federal official, staff member, or any other individual or entity concerning the development, promulgation, or enforcement of Executive Order 25-244.

Topic 8: The Executive Office of the Governor's basis for issuing Executive Order 25-244, including but not limited to: (a) the Governor's authority to issue the order, (b) the purpose of the order, (c) the justifications and factual grounds for issuing the order, (d) the governmental and/or public interest served by the order, and (e) how the order serves those interests.

Topic 9: The Executive Office of the Governor's understanding of CAIR's rights under Executive Order 25-244.

Topic 10: The two "CAIR Bullet Points" documents provided in discovery (Def's 00001–00007), including (a) the individuals involved in preparing them, (b) the sources consulted in preparing them, (c) the process of preparing them, and (d) their purpose.

Topic 11: The Executive Office of the Governor's involvement in and awareness of the denial of CAIR-Florida's access to the 2026 Muslim Day event at the Florida Capitol.

Topic 12: The Executive Office of the Governor's involvement in and awareness of the statement posted by Attorney General Uthmeier on social media on January 23, 2026, regarding the South Florida Muslim Conference at the Coral Springs Center for the Arts.

Topic 13: Any actions the Executive Office of the Governor has taken to effectuate or enforce Executive Order 25-244, including any actions the Executive Office of the Governor has directed its agencies or any other party to take for such purpose.

Topic 14: The Executive Office of the Governor's understanding of how Executive Order 25-244 would be implemented or enforced against CAIR or CAIR-Florida or against individuals or entities alleged to provide "material support" to Plaintiffs.

Topic 15: The Executive Office of the Governor's development and issuance of public statements concerning Executive Order 25-244, CAIR, CAIR-Florida, Islam, and/or Muslims.

Topic 16: The Executive Office of the Governor's efforts to use litigation or discovery to obtain information about CAIR and CAIR-Florida's finances or internal operations.

Topic 17: The Executive Office of the Governor's involvement in any other current or contemplated government actions, programs, or policies concerning CAIR or CAIR-FL.

Topic 18: Defendant's Responses to Plaintiffs' Requests for Production, Requests for Admission, and Interrogatories.

Dated: August 17, 2026

Elizabeth C. Lockwood (pro hac vice)
ALI & LOCKWOOD LLP
501 H Street NE, Suite 200
Washington, DC 20002
(202) 651-2477
liz.lockwood@alilockwood.com

Arthur Ago (pro hac vice)

Shereef H. Akeel (pro hac vice)
Samuel Simkins (pro hac vice)
AKEEL & VALENTINE, PLC
888 West Big Beaver Road, Ste. 350
Troy, MI 48084
(248) 269-9595
shereef@akeelvalentine.com
sam@akeelvalentine.com

Aaron Fleisher (pro hac vice)

/s/ Brant Levine

Brant Levine (pro hac vice)

Mary Ella W. Simmons (pro hac vice)

Huey Fischer Garcia (pro hac vice)

SOUTHERN POVERTY LAW CENTER

400 Washington Ave

Montgomery, AL 31604

(771) 215-8661

scott.mccoy@splcenter.org

aaron.fleisher@splcenter.org

arthur.ago@splcenter.org

brant.levine@splcenter.org

maryella.simmons@splcenter.org

huey.fischergarcia@splcenter.org

Hina Shamsi (pro hac vice)

Charles Hogle (pro hac vice)

Celin Carlo-Gonzalez (pro hac vice)

Natalie Smith (pro hac vice)

AMERICAN CIVIL LIBERTIES

UNION FOUNDATION

125 Broad Street, 18th Floor

New York, NY 10004

(212) 549-2500

hshamsi@aclu.org

charlie.hogle@aclu.org

ccarlo-gonzalez@aclu.org

n.smith@aclu.org

Daniel B. Tilley

FL Bar No. 102882

ACLU OF FLORIDA

4343 West Flagler Street, Suite 400

Miami, FL 33134

(786) 363-2714

dtilley@aclufl.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2026, I sent, via electronic mail, the foregoing Amended Notice of Rule 30(b)(6) Deposition on behalf of the Plaintiffs to the following counsel of record:

David M.S. Dewhirst
Solicitor General
Jeffrey P. DeSousa (FBN 110951)
Jason J. Muehlhoff
Chief Deputy Solicitors General
Tyler E. Gustafson (FBN 1049292)
Assistant Solicitor General
Coleman Batson (FBN 110018)
Special Counsel
Office of the Attorney General
The Capitol, PL-01
Tallahassee, Florida 32399
(850) 414-3300
david.dewhirst@myfloridalegal.com
jeffrey.desousa@myfloridalegal.com
jason.muehlhoff@myfloridalegal.com
tyler.gustafson@myfloridalegal.com
coleman.batson@myfloridalegal.com

/s/ Elizabeth C. Lockwood
Elizabeth C. Lockwood (pro hac vice)
ALI & LOCKWOOD LLP
501 H Street NE, Suite 200
Washington, DC 20002
(202) 651-2477
liz.lockwood@alilockwood.com

*Counsel for CAIR Foundation and
CAIR-Florida*