

**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.

SEVENTH JOINT STATUS REPORT ON DISCOVERY

As required by this Court's January 29, 2026, Initial Scheduling Order, Doc. No. 30, ¶ (1)(b), counsel for all parties report the following progress on discovery:

1. On March 9, 2026, Plaintiffs served their First Interrogatories and Requests for Production on Defendant. After being granted a two-week extension to respond, Defendant served objections and responses (but not documents) on April 22. On April 28, Defendant produced some documents and a privilege log, explaining that additional documents would be produced on a rolling basis after counsel completed a responsiveness-and-privilege review. Defendant did so, completing its document production on May 18.

2. On April 17, 2026, Defendant served Plaintiffs with Interrogatories, Requests for Production, and Requests for Admission. Plaintiffs served their responses to Defendant's Interrogatories on June 1, 2026, and responses to Defendant's Requests for Production and Requests for Admission on June 4, 2026, pursuant to an agreed extension. Plaintiffs produced two documents. The parties have repeatedly met and conferred over the sufficiency of Plaintiffs' responses and objections to those requests.
3. On May 12, 2026, Plaintiffs served their First Requests for Admission on Defendant. Defendant served his responses on June 11, 2026.
4. On May 29, 2026, Plaintiffs served their Second Interrogatories and Requests for Admission on Defendant. Defendant served his responses on June 29, 2026.
5. On May 29, 2026, the parties exchanged expert reports.
6. On June 22, 2026, this Court granted the parties' joint motion for extension of deadlines, Doc. No. 63, extending the discovery deadline to August 26, 2026.
7. On June 23, 2026, Plaintiffs moved to compel production of documents that Defendant withheld as privileged. Defendant later produced those documents, mooting Plaintiffs' motion to compel.

8. On June 26, 2026, Plaintiffs served the rebuttal report of their expert witness. Defendant did not serve a rebuttal expert report.
9. On July 14, 2026, the parties filed a second Joint Motion to Continue Discovery and Dispositive Motion Deadlines, Doc. No. 88. This Court granted the motion on July 14, 2026, Doc. No. 89, extending the discovery deadline to October 26, 2026, and the deadline to file motions for summary judgment to November 16, 2026.
10. On July 17, 2026, Plaintiffs served amended responses to Defendant's First Requests For Production; no documents were produced. On July 24, 2026, Plaintiffs served amended responses to Defendant's First Interrogatories.
11. On July 22, 2026, Defendant filed his Motion to Compel Discovery, Doc. No. 91, requesting that the Court order Plaintiffs to respond to certain categories of documents in Defendant's Requests for Production. Plaintiffs filed their response in opposition on August 5, 2026, Doc. No. 92.
12. On August 26, 2026, Plaintiffs' counsel took the 30(b)(6) deposition of the representative of Executive Office of the Governor and Defendant's Deputy Chief of Staff, Jay K. Arnold, Jr. On August 27, 2026, Plaintiffs' counsel took the deposition of the Capitol's Property Logistics Administrator, Thomas Bower.

13. On September 2, 2026, Plaintiffs produced to Defendant additional responsive and non-confidential documents. The parties have recently met and conferred over the terms of a protective order to limit disclosure of confidential information, but no agreement has been reached. Plaintiffs anticipate filing a motion for a protective order and will produce responsive and confidential documents once that issue is resolved.
14. The deposition of Defendant's expert is scheduled for September 30, 2026, and the deposition of Plaintiff's expert is scheduled for October 19. The parties are conferring on other dates for other depositions and anticipate that a further extension of discovery deadlines may be needed.

Respectfully submitted this 3rd day of September, 2026.

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