

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

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

Plaintiffs,

v.

Case No. 4:26-cv-315-MW-MJF

RON DESANTIS, *et al.*,

Defendants.

JOINT STATUS REPORT

Pursuant to the parties’ July 22, 2026 submission (ECF No. 39), the parties submit this joint status report regarding Plaintiffs CAIR-Foundation, Inc. (“CAIR”) and CAIR Florida, Inc.’s (“CAIR-Florida”) forthcoming motion for emergency injunctive relief.

The Florida Department of Law Enforcement (“FDLE”) issued regulations implementing Florida Statute § 943.03102 on September 11, 2026. FDLE has transmitted a notice of intent to designate Plaintiffs as “domestic terrorist organizations” to Plaintiffs’ counsel. Counsel for both parties met and conferred on September 14, 2026, to discuss a briefing schedule for Plaintiffs’ motion for emergency injunctive relief if the Governor and Cabinet approve a designation of Plaintiffs as “domestic terrorist organizations.” Consistent with these discussions, the parties respectfully ask the Court to adopt the following schedule:

- (1) Plaintiffs' amended complaint and motion for a temporary restraining order/preliminary injunction shall be due October 1.
- (2) Defendants' opposition brief shall be due October 15.
- (3) Plaintiffs' reply brief shall be due October 22.
- (4) A hearing on Plaintiffs' motion shall be held on October 27.
- (5) Pursuant to the implementing regulations, based on the current regulatory timeline, the earliest date that any designation of Plaintiffs as "domestic terrorist organizations" may become effective is November 5. To ensure that the Court issues a ruling on Plaintiffs' motion before any designation becomes effective, and to provide the parties the opportunity for emergency appellate review before the effective date of any such designation, the parties respectfully request that the Court rule on Plaintiffs' motion by November 2.

Given the complexity of the statutory regime at issue and the number of constitutional issues that the parties intend to address, the parties also jointly request that the Court extend the default word-limits to the following:

- Plaintiffs' opening brief in support of their motion: 11,000 words
- Defendants' opposition brief: 11,000 words
- Plaintiffs' reply brief: 5,500 words

The parties also discussed discovery and whether they intend to rely on declarations in lieu of live witnesses. At present, they believe it is likely that they will be relying on declarations in lieu of live witnesses and will not request discovery in connection with Plaintiffs' motion, but the parties will continue to

confer on these issues and will provide an update to the Court if that becomes necessary.

Dated: September 15, 2026

Respectfully submitted,

/s/ Charles J. Cooper

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**Pro hac vice motion forthcoming*

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