

**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.

EIGHTH 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, mooted 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 continued to meet and confer over the terms of a protective order to limit disclosure of confidential information. The parties' negotiations are now narrowed to one issue. Plaintiffs are waiting for Defendant to clarify his position on that issue, so that they can assess whether they will need to file a motion for a protective order. Once this issue is resolved, Plaintiffs will produce responsive and confidential documents.
14. The previously scheduled expert depositions have been postponed, and the parties are conferring on new dates in November for these witnesses.
15. On September 4, 2026, the parties filed their respective notices to supplement the record as required by the Magistrate Judge's Order regarding Defendant's Motion to Compel.
16. On September 9, 2026, Plaintiffs served a subpoena to produce documents on the employer of Defendant's expert witness. The response deadline is October 20.
17. On September 12, 2026, Plaintiffs served revised responses to Defendant's First Requests for Admission, in response to correspondence from Defendant requesting that certain responses be amended.

18. On September 15, 2026, Plaintiff served a subpoena to produce documents on Defendant's expert witness. That witness has since produced some documents and objected to other requests. The parties continue to meet and confer to try to resolve these issues.
19. On September 17, 2026, Defendant served a Rule 30(b)(6) notice to depose Plaintiffs. Plaintiffs are evaluating the proposed deposition topics and will meet and confer with Defendant to try to resolve any objections.
20. On September 21, 2026, Plaintiffs notified Defendant of perceived deficiencies in his discovery responses. The parties have since met and conferred to narrow the issues in dispute, and Defendant agreed to amend certain discovery responses by October 13.
21. On September 22, 2026, counsel for all parties met and conferred regarding the proposed protective order, depositions of both parties' witnesses, and the deliberative process objections raised during the deposition of Defendant's 30(b)(6) designated witness.
22. On September 23, 2026, this Court granted the parties' motion to extend discovery deadlines, and the discovery deadline was extended to January 15, 2027.
23. On September 24, 2026, Plaintiffs filed their Motion to Compel Deposition Testimony Withheld Under the Deliberative Process Privilege.

24. On September 24, 2026, this Court deferred ruling on Defendant's Motion to Compel until after the parties engage in an ESI discovery conference and file a joint notice reporting on same.
25. On September 25, 2026, Defendant notified Plaintiffs of perceived deficiencies in their discovery responses. The parties have since met and conferred to narrow the issues in dispute, and Defendant has agreed to provide additional clarification regarding why he perceives certain requests to be deficient. Plaintiffs are also working to amend certain discovery responses in response to Defendant's concerns.
26. On September 30, 2026, Plaintiffs noticed the depositions of two fact witnesses that were involved with drafting the Executive Order. Those are tentatively scheduled for October 15 and 23.
27. On October 1, the parties held an ESI discovery conference and discussed foreign-language discovery, pursuant to this Court's order. *See* ECF 102. In connection with that conference, the parties have been negotiating an ESI Protocol. Defendant proposed an initial draft, which Plaintiffs have revised. The parties will file a status report on these issues by October 8, 2026.

Respectfully submitted this 8th day of October, 2026.

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