

**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.

_____/

**DEFENDANT'S RESPONSE IN OPPOSITION TO
PLAINTIFFS' MOTION TO COMPEL DISCOVERY**

Defendant hereby notifies this Court that the Motion to Compel, DE64, has been rendered moot, pursuant to an agreement between Plaintiffs and Defendant that Plaintiffs withdraw their Motion to Compel after Defendant produced the remaining 15 records in Defendant's Amended Privilege Log. *See* Plaintiffs' Exhibit C; *see also* Defendant's Exhibit A. That production is complete, and, thus, the Motion to Compel is moot. *See* Defendant's Exhibit B.

CONCLUSION

For the foregoing reasons, Defendant requests that this Court deny Plaintiffs' Motion to Compel as moot because Defendant has produced the records subject to Plaintiffs' Motion to Compel. DE64.

Respectfully submitted,

JAMES UTHMEIER
Attorney General

RYAN D. NEWMAN
*Chief Deputy Attorney
General*

DAVID M.S. DEWHIRST
Solicitor General

/s/ Tyler E. Gustafson
JEFFREY PAUL DESOUSA
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JASON J. MUEHLHOFF
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Counsel for Governor DeSantis

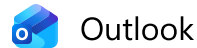
CERTIFICATE OF WORD COUNT

Pursuant to N.D. Fla. Loc. R. 7.1(F), the undersigned hereby certifies that this motion contains 219 words, inclusive of headings, footnotes, and quotations, according to the word-processing system used to prepare the motion.

DATE: June 30, 2026

/s/ Tyler E. Gustafson

Exhibit A



Re: CAIR v. DeSantis Discovery

From Tyler Gustafson <Tyler.Gustafson@myfloridalegal.com>

Date Tue 6/30/2026 6:18 PM

To Liz Lockwood <liz.lockwood@alilockwood.com>; Brant Levine <brant.levine@splcenter.org>

Cc Scott McCoy <Scott.McCoy@splcenter.org>; Coleman Batson <Coleman.Batson@myfloridalegal.com>; Jason Muehlhoff <Jason.Muehlhoff@myfloridalegal.com>; Casey Witte <Casey.Witte@myfloridalegal.com>; David Dewhirst <David.Dewhirst@myfloridalegal.com>; Jeffrey DeSousa <Jeffrey.DeSousa@myfloridalegal.com>; Jenna Hodges <Jenna.Hodges@myfloridalegal.com>; CAIRvDeSantis <cairvdesantis@splcenter.org>

Your confirmation is much appreciated!

Best,



Tyler E. Gustafson
Assistant Solicitor General
Office of Attorney General James Uthmeier
PL-01, The Capitol | Tallahassee, FL 32399
(850) 414-3681

From: Liz Lockwood <liz.lockwood@alilockwood.com>

Sent: Tuesday, June 30, 2026 6:15 PM

To: Tyler Gustafson <Tyler.Gustafson@myfloridalegal.com>; Brant Levine <brant.levine@splcenter.org>

Cc: Scott McCoy <Scott.McCoy@splcenter.org>; Coleman Batson <Coleman.Batson@myfloridalegal.com>; Jason Muehlhoff <Jason.Muehlhoff@myfloridalegal.com>; Casey Witte <Casey.Witte@myfloridalegal.com>; David Dewhirst <David.Dewhirst@myfloridalegal.com>; Jeffrey DeSousa <Jeffrey.DeSousa@myfloridalegal.com>; Jenna Hodges <Jenna.Hodges@myfloridalegal.com>; CAIRvDeSantis <cairvdesantis@splcenter.org>

Subject: Re: CAIR v. DeSantis Discovery

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Counsel,

Yes, that's right. Though we reserve the right to raise this issue again with the Court if needed in connection with our upcoming depositions.

Thanks,
Liz

—

Liz Lockwood
Ali & Lockwood LLP
312.852.0011

From: Tyler Gustafson <Tyler.Gustafson@myfloridalegal.com>

Sent: Tuesday, 30 June 2026 18:11:12

To: Liz Lockwood <liz.lockwood@alilockwood.com>; Brant Levine <brant.levine@splcenter.org>

Cc: Scott McCoy <Scott.McCoy@splcenter.org>; Coleman Batson <Coleman.Batson@myfloridalegal.com>; Jason Muehlhoff <Jason.Muehlhoff@myfloridalegal.com>; Casey Witte <Casey.Witte@myfloridalegal.com>; David Dewhirst <David.Dewhirst@myfloridalegal.com>; Jeffrey DeSousa <Jeffrey.DeSousa@myfloridalegal.com>; Jenna Hodges <Jenna.Hodges@myfloridalegal.com>; CAIRvDeSantis <cairvdesantis@splcenter.org>

Subject: Re: CAIR v. DeSantis Discovery

Good evening, Counsel,

Just for clarity, do we have an agreement that you will withdraw the motion to compel when we produce the remaining documents in the Amended Privilege Log?

Best,



Tyler E. Gustafson
Assistant Solicitor General
Office of Attorney General James Uthmeier
PL-01, The Capitol | Tallahassee, FL 32399
(850) 414-3681

Exhibit B

Uploads

Processing jobs

Productions

+ New protocol

Protocols

Multi-production privile...

Advanced settings

Productions

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Enter production name or log name

Filter by date

(Any date)

Filter by prefix

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PLACEHOLDERS

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2026/06/09

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DEF'S RESPONSE TO PLTF'S 1ST RFP000157

✓ 2

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WITHHELD

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PLACEHOLDERS

2

Show Production History (1)