

**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.

SIXTH 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. The parties have recently met and conferred over the terms of a protective order to limit disclosure of protected information. Once the parties reach agreement and the Court enters the order, Plaintiffs will produce responsive documents that are not subject to the motion to compel.
13. No depositions have occurred yet, but the parties are conferring over potential dates and witnesses. The parties have also met and conferred regarding a

dispute over whether Defendant may invoke the deliberative process privilege at the 30(b)(6) deposition of the Executive Office of the Governor, but no agreement has been reached.

Respectfully submitted this 6th day of August, 2026.

Counsel for Plaintiffs:

/s/ Aaron Fleisher

Aaron Fleisher

Admitted pro hac vice

Arthur Ago (pro hac vice)
Brant Levine (pro hac vice)
Mary Ella W. Simmons (pro hac vice)
Huey Fischer Garcia (pro hac vice)
Scott D. McCoy (FBN 1004965)
SOUTHERN POVERTY LAW CENTER
400 Washington Ave
Montgomery, AL 31604 (786) 347-2056
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

Counsel for Defendant:

/s/ Tyler E. Gustafson

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

Counsel for Governor DeSantis

hshamsi@aclu.org
charlie.hogle@aclu.org
ccarlo-gonzalez@aclu.org
n.smith@aclu.org

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

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

Daniel B. Tilley
FL Bar No. 102882
ACLU OF FLORIDA
4343 West Flagler Street, Suite 400
Miami, FL 33134
(786) 363-2714
dtalley@aclufl.org

*Counsel for CAIR Foundation
and CAIR-Florida*