

**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.

_____/

CAIR FOUNDATION’S INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26 (a)(1), Plaintiff CAIR-Foundation, Inc, by and through undersigned counsel, makes the following initial disclosures. As discovery has just begun, the information contained herein and the documents identified, described, or produced are based upon the information presently available to Plaintiff.

These disclosures are made without prejudice to Plaintiff’s right to produce any information which may be subsequently discovered or determined to be relevant to the subject matter of this action. Each of the following initial disclosures is made subject to any and all objections, including but not limited to competency, materiality, relevancy, propriety, admissibility, or any other ground that would

require their exclusion in any proceeding. Any and all such objections and grounds are expressly reserved and may be interposed at any appropriate time.

By making the Initial Disclosures, Plaintiff does not represent that they are identifying every document, tangible thing, or witness possibly relevant to this adversary proceeding. Nor does Plaintiff waive their rights to object to production of any document or tangible thing disclosed on the basis of any privilege, including the attorney-client privilege, the work product doctrine, relevancy, undue burden or any other valid objection. The Initial Disclosures represent good faith effort to identify information Plaintiff reasonable believe are required by Rule 26 (a)(1) of the Federal Rules of Civil Procedure.

The disclosures set forth below are made subject to the above objections and qualifications. Plaintiff reserves the right to supplement these disclosures at any time during the pendency of this action.

(1) The name and, if known, the address and telephone number of each individual likely to have discoverable information- along with subjects of that information- that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

1. Manal Fakhoury, National Board Chair, c/o undersigned counsel. Ms.

Fakhoury has information regarding the impact of Executive Order 25-

244 on Plaintiffs, including organizational harm, third party reactions, and effects on Plaintiffs' activities and partnerships.

2. Nihad Awad, CAIR National Executive Director, c/o undersigned counsel. Mr. Awad has information regarding CAIR's advocacy activities and the impact of Executive Order 25-244 on Plaintiffs, including organizational harm, third party reactions, and effects on Plaintiffs' activities and partnerships.
3. Edward Ahmed Mitchell, CAIR National Deputy Director, c/o undersigned counsel. Mr. Mitchell has information regarding CAIR's advocacy activities, the podcast cancellation, and the effects of the Executive Order.
4. Thania Clevenger, CAIR Chief Operating Officer, c/o undersigned counsel. Ms. Clevenger has information regarding CAIR operations and the impact of the Executive Order.
5. Robert McCaw, CAIR Government Affairs Director, c/o undersigned counsel. Mr. McCaw has information regarding CAIR's government affairs and advocacy activities.
6. Tayyab Yunus, CEO, Intuitive Solutions, c/o undersigned counsel. Mr. Yunus has information regarding the podcast cancellation and the effects of the Executive Order.

7. Josh Pies, Owner, C47 Films, 1st Floor Studio – 227 S. Orlando Ave, Winter Park, FL 32789. Mr. Pies has information regarding the cancellation of the podcast agreement with CAIR following the issuance of Executive Order 25-244.
8. Robin Despins, Benevity, Cause Operations Analyst. #700, 611 Meredith Road NE, Calgary, AB T2E 2W5. Ms. Despins has information regarding the deactivation of CAIR Florida's account following the issuance of Executive Order 25-244.
9. Defendant Governor Ronald DeSantis. Governor DeSantis has information regarding the issuance and purpose of Executive Order 25-244.
10. Attorney General James Uthmeier, PL-01, The Capitol Tallahassee, FL 32399-1050. Attorney General Utmeier has information regarding statements made by Florida officials concerning Plaintiffs and Executive Order 25-244, including communications or actions relating to the Executive Order and its implementation, and statements encouraging or discouraging third parties from associating with Plaintiffs.
11. Jay K. Arnold Jr., Deputy Chief of Staff, Executive Office of the Governor. Mr. Arnold Jr. has information regarding the research,

drafting, and issuance of Executive Order 25-244; communications or actions relating to the Executive Order and its implementation; and statements encouraging or discouraging third parties from associating with Plaintiffs.

12. Present and former employees of the Executive Office of the Governor involved in drafting or issuing Executive Order 25-244, c/o Defendants' counsel.

13. All witnesses included in Defendant's Initial Disclosures.

As discovery in this matter has begun, Plaintiff anticipates identifying additional witnesses and will do so through the discovery process or by supplementing these disclosures. Additionally, Plaintiff generally refers to the individuals in the documents produced herewith as witnesses likely to have discoverable information. By listing witnesses, Plaintiff in no way waives any rights or objections to admission of their testimony at a later date.

The listing of these parties is neither a representation that these potential witnesses necessarily have information, nor is this listing intended to be a limitation on the matter upon which these parties may give testimony. Plaintiff expressly reserves the right to identify and call as witnesses additional persons, if during the course of discovery and investigation relating to this case, Plaintiff learns that such additional persons have knowledge of relevant matters.

(2) A copy- or a description by category and location- of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

1. Executive Order 25-244 and related public records concerning its issuance and implementation.
2. Public statements by Defendant and other Florida officials concerning Plaintiffs, including press releases, interviews, speeches, and social media posts.
3. Communications and documents reflecting the cancellation or disruption of relationships with third parties following issuance of the Executive Order, including but not limited to:
 - a. the cancellation of the C47 podcast production agreement, and
 - b. the deactivation of CAIR Florida's Benevity account.
4. Communications with government entities or officials relating to the Executive Order.
5. Declarations and supporting materials submitted in connection with Plaintiff's Motion for Preliminary Injunction.
6. Publicly available reports, publications, and materials relied upon by Defendant.

7. Documents sufficient to establish attorneys' fees and costs incurred in connection with this action.

These documents are maintained in Plaintiff's electronic systems, including but not limited to Microsoft Outlook, Microsoft Teams, and other electronic storage platforms used in the ordinary course of Plaintiff's operations.

Plaintiff will produce responsive documents in accordance with the Federal Rules of Civil Procedure and reserve the right to supplement these disclosures as discovery proceeds.

(3) A computation of each category of damages claimed by the Plaintiffs- who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Plaintiffs are entitled to recover all attorneys' fees and costs they have expended or will expend. Plaintiff reserves the right to supplement these disclosures and will supplement this response as additional information becomes available concerning the value of damages.

(4) Attach for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part

of a possible judgement in the action or to indemnify or reimburse for payments made to satisfy the judgement.

None.

DATED: March 13, 2026

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2026, I sent, via electronic mail, the foregoing Plaintiff CAIR-Foundation, Inc.'s Initial Disclosures, on behalf of the Plaintiff to the following counsel of record for Defendant:

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