

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:22-cv-24066-KMM

GRACE, INC., *et al.*,

Plaintiffs,

v.

CITY OF MIAMI,

Defendant.

PLAINTIFFS' RULE 26(a)(3) PRETRIAL DISCLOSURES

Pursuant to FRCP 26(a)(3) and Local Rule 16.1(d), Plaintiffs disclose the following information about the evidence that it may present at trial other than solely for impeachment:

1. Identification of Witnesses

a. Expect to call:

- i. Miguel De Grandy, Holland & Knight LLP, 701 Brickell Ave Ste 3000,
Miami, FL 33131, (305) 789-7535
- ii. Dr. Carolyn Abbott, c/o undersigned counsel
- iii. Dr. Bryant Moy, c/o undersigned counsel

b. May call if the need arises:

- i. Dr. Cory McCartan, c/o undersigned counsel
- ii. Rebecca Pelham, c/o undersigned counsel
- iii. Rev. Nathaniel Robinson III, c/o undersigned counsel
- iv. Carolyn Donaldson, c/o undersigned counsel
- v. Daniella Pierre, c/o undersigned counsel
- vi. Harold Ford, c/o undersigned counsel

- vii. Clarice Cooper, c/o undersigned counsel
- viii. Jared Johnson, c/o undersigned counsel
- ix. Steven Miro, c/o undersigned counsel
- x. Yanelis Valdes, c/o undersigned counsel
- xi. Alexandra Contreras, c/o undersigned counsel
- xii. Christopher Johnson, GrayRobinson, P.A., 333 SE 2nd Ave Ste 3200,
Miami, FL 33131, (305) 416-6880
- xiii. Nicholas Warren, c/o undersigned counsel
- xiv. Stephen Cody, 16610 SW 82nd Ct, Palmetto Bay, FL 33157
- xv. Christina White, Miami-Dade County Elections Department, 2700 NW
87th Ave, Doral, FL 33172, (305) 499-8683
- xvi. Larry Spring, Miami Riverside Center, 444 SW 2nd Ave, Miami, FL, 33130,
(305) 416-1025
- xvii. Todd Hannon, Office of the City Clerk, 3500 Pan American Dr, Miami, FL
33133, (305) 250-5360
- xviii. All persons identified or called by Defendant.
- xix. Any other witnesses needed for impeachment or rebuttal.

2. Deposition Designations:¹

- a. Christina White
- b. Larry Spring
- c. Todd Hannon

¹ The Parties have agreed to exchange exact designations at a later date.

3. Identification of Exhibits

- a. **Expect to offer:** see **Exhibit 1** attached
- b. **May offer if the need arises:**
 - i. All documents Plaintiffs produced through discovery in this case.
 - ii. All documents Defendant produced through discovery in this case.
 - iii. All documents Plaintiffs or Defendant identified in their disclosures in this case.

Respectfully submitted this 29th day of December, 2023.

/s/ Nicholas L.V. Warren

Nicholas L.V. Warren (FBN 1019018)
ACLU Foundation of Florida
1809 Art Museum Drive, Suite 203
Jacksonville, FL 32207
(786) 363-1769
nwarren@aclufl.org

Daniel B. Tilley (FBN 102882)
Caroline A. McNamara (FBN 1038312)
Janine M. Lopez (FBN 1038560)
ACLU Foundation of Florida
4343 West Flagler Street, Suite 400
Miami, FL 33134
(786) 363-2714
dtilley@aclufl.org
cmcnamara@aclufl.org

Gregory P. Luib*
Dechert LLP
1900 K Street NW
Washington, DC 20006
(202) 261-3413
gregory.luib@dechert.com

Neil A. Steiner*
Julia Markham-Cameron*
Dechert LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3822
neil.steiner@dechert.com
julia.markham-cameron@dechert.com

Christopher J. Merken*
Dechert LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104
(215) 994-2380
christopher.merken@dechert.com

* *Admitted pro hac vice*

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email on this 29th day of December, 2023, to the following:

Counsel of Record for Defendant.

/s/ Julia Markham-Cameron
Julia Markham-Cameron*
Dechert LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3822
[julia.markham-
cameron@dechert.com](mailto:julia.markham-cameron@dechert.com)

* admitted *pro hac vice*

Plfs.' Tr. Ex.	Bates Number	ECF	Doc Date	Description	File Name	Category	Obj. Codes
1		24-11	11/18/2021	Nov 18 2021 Transcript		2021-22 Transcripts	
2		24-12	12/9/2021	Dec 9 2021 Transcript		2021-22 Transcripts	
3		24-13	2/7/2022	Feb 7 2022 Transcript		2021-22 Transcripts	
4		24-14	2/25/2022	Feb 25 2022 Transcript AM		2021-22 Transcripts	
5		24-15	2/25/2022	Feb 25 2022 Transcript PM		2021-22 Transcripts	
6		24-16	3/11/2022	Mar 11 2022 Transcript AM		2021-22 Transcripts	
7		24-17	3/11/2022	Mar 11 2022 Transcript PM		2021-22 Transcripts	
8		24-18	3/24/2022	Mar 24 2022 Transcript		2021-22 Transcripts	
9	COM24066-027841		7/8/2021	2022 cycle De Grandy contract	-clean copy Holland Knight PSA - Redistricting Services (Matter 21-354).pdf	2021-22 Consultant Materials	
10	COM24066-028531		2/10/2021	Bid waiver for De Grandy contract	Resolution R-21-0084 - Bid Waiver – Miguel De Grandy.pdf	2021-22 Consultant Materials	
11	COM24066-052672		10/21/2021	2021 De Grandy VRA instructions	00000494_RE_City of Miami Redistricting Update.msg	2021-22 Consultant Materials	
12	COM24066-000772		11/12/2021	Nov 2022 De Grandy Initial Report cover email	PRR Responsive Records 10-31-22 single_Redacted.pdf	2021-22 Consultant Materials	
13	COM24066-000812		11/12/2021	Nov 2022 De Grandy Initial Report	Redistrictng Initial Report and Legal Primer_49399045v1.PDF	2021-22 Consultant Materials	
14	COM24066-000066	24-3	11/18/2021	Nov 18 2021 De Grandy slides	11-18-21 CC Mtg - Miguel DeGrandy - PowerPoint Presentation_49399056v1.PDF	2021-22 Consultant Materials	
15	COM24066-000001	24-4	2/7/2022	Feb 7 2022 De Grandy slides	02-07-22 SCC Mtg - Miguel DeGrandy - Redistricting Presentation_49399049v1.PDF	2021-22 Consultant Materials	
16	COM24066-000040	24-5	2/7/2022	Feb 7 2022 De Grandy talking points	02-07-22 SCC Mtg - Miguel DeGrandy - Talking Points for Presentation.pdf	2021-22 Consultant Materials	
17	COM24066-000643	24-6	2/7/2022	Feb. 7, 2022 Cody Memo on Areas Moved in Feb. 7 Draft	Memo - Miguel A. DeGrandy - Characteristics of Areas of Movement in the City of Miami (2.7.2022).pdf	2021-22 Consultant Materials	
18	COM24066-009601		2/22/2022	De Grandy Redistricting Miami 2022 report	Redistricting Miami 2022.pdf	2021-22 Consultant Materials	
19	COM24066-000122	24-7	2/25/2022	Feb 25 2022 De Grandy slides	11493 Submittal - Miguel DeGrandy - Presentation to City Commission - Revised Plan 2-25-22_49399055v1.PDF	2021-22 Consultant Materials	
20	COM24066-000153	24-8	3/11/2022	Mar 11 2022 De Grandy slides	11582 Submittal - Miguel DeGrandy - Presentation to City Commission 03-11-2022_49399046v1.PDF	2021-22 Consultant Materials	
21	COM24066-045285		3/11/2022	Alternative: Keep Areas South of US 1 in D2 and Adjust D3 City of Miami	Submittal - Miguel DeGrandy - Keep Area South of US1 in D2 with ADJUSTMENT Presentation – 03-11-2022.pdf	2021-22 Consultant Materials	
22	COM24066-000167	24-10	3/24/2022	Mar 24 2022 De Grandy slides	11673 Submittal - Miguel DeGrandy - Presentation to City Commission _03-24-2022.pdf	2021-22 Consultant Materials	
23		24-28	2/25/2022	First ACLU letter to City		Other 2022 Process Materials	

Plfs.' Tr. Ex.	Bates Number	ECF	Doc Date	Description	File Name	Category	Obj. Codes
24	COM24066-049157	24-29	3/31/2022	Mar 31 2022 ACLU to Mayor Suarez	ACLU-FL Letter on City of Miami Redistricting 3-31-22.pdf	Other 2022 Process Materials	
25	COM24066-000409		4/1/2022	Mayor Suarez letter to De Grandy	Jurisdictional Boundaries of the City of Miami Commission Districts.pdf	Other 2022 Process Materials	
26	COM24066-000827		4/2/2022	De Grandy response to Mayor Suarez	Response to Mayor's Correspondence.pdf	Other 2022 Process Materials	
27		82-1	5/11/2023	May 11 2023 Transcript		2023 Transcripts	
28		82-2	6/14/2023	Jun 14 2023 Transcript		2023 Transcripts	
29	COM24066-045805	77	6/14/2023	Jun 14 2023 De Grandy slides	14148 - Submittal-MDG - PowerPoint Pres 1.pdf	2023 Consultant Materials	
30	COM24066-045824		6/14/2023	Jun 14 2023 De Grandy draft maps	14148 - Submittal-MDG - PowerPoint Pres 2 - Final.pdf	2023 Consultant Materials	
31	COM24066-003401	82-5	6/14/2023	Jun 14 2023 redistricting mtg agenda	Final Agenda - June 14, 2023 Special.pdf	Other 2023 Process Materials	
32	COM24066-000209	77	6/14/2023	Resolution 23-271	Certified Copy - Resolution R-23-0271 - Redistricting.pdf	Other 2023 Process Materials	
33	COM24066-048094	77	5/23/2023	May 23 2023 Plaintiffs letter with P1/P2	Miami Plaintiffs' Letter re Proposed Remedial City Commission Maps.pdf	Other 2023 Process Materials	
34		82-8	6/9/2023	Ability to elect in D5 P1/P2		Other 2023 Process Materials	
35		82-9	6/12/2023	Moy analysis re P1/P2		Other 2023 Process Materials	
36		82-7	6/13/2023	ACLU email to City counsel sharing maps		Other 2023 Process Materials	
37		82-10	6/17/2023	Plaintiffs letter to Mayor Suarez urging veto		Other 2023 Process Materials	
38		82-14	5/26/2023	Commissioner King instagram post		Other 2023 Process Materials	
39		82-15	6/14/2023	Commissioner King facebook post		Other 2023 Process Materials	
40		82-16	6/13/2023	Samantha Morrell, Supreme Court Decision Impact on Miami's Black Voters as Redistricting Heats Up, MIA. TIMES		Other 2023 Process Materials	
41	COM24066-003822		6/30/2023	Mendez email re passage of new map	00001552_Fw_Redistricting Update- Adopted Maps fs119exempt.msg	Other 2023 Process Materials	
42	COM24066-003283		8/1/2023	City to County email re City Map pending appeal	00000910_RE_City of Miami - Redistricting Map (June 2023).msg	Other 2023 Process Materials	
43	GRACEPLFS0000002		10/24/2019	GRACE Bylaws	GRACE BYLAWS_10-24-19.pdf	Plaintiff Materials - GRACE	
44	GRACEPLFS0001299		5/26/2022	GRACE member orgs	G.R.A.C.E., Inc. Partners.xlsx	Plaintiff Materials - GRACE	
45	COM24066-063033		2/6/2022	Feb 6 2022 HOTA letter to City - GRACE org	City of Miami Commissioners 2-6-2022.pdf	Plaintiff Materials - GRACE	
46	COM24066-063034		2/6/2022	Feb 6 2022 Coconut Grove Community Advisory Committee letter to City - GRACE org	CAC-Commissioners Letter 2-6-2022.pdf	Plaintiff Materials - GRACE	
47	GRACEPLFS0000919		3/1/2019	NAACP unit bylaws	Bylaws for Units_NAACP.pdf	Plaintiff Materials - NAACP	
48	GRACEPLFS0001012		3/1/2019	NAACP constitution	NAACP Constitution_NAACP.pdf	Plaintiff Materials - NAACP	
49	GRACEPLFS0001056		2/1/2022	NAACP redistricting letter	redistricting city of miami best.jpeg	Plaintiff Materials - NAACP	
50	COM24066-059114		3/11/2022	Mar 11 2022 NAACP letter to City	00000544_Dilution of the Black residents of the Grove votes.msg	Plaintiff Materials - NAACP	

Plfs.' Tr. Ex.	Bates Number	ECF	Doc Date	Description	File Name	Category	Obj. Codes
51	COM24066-060646		3/24/2022	Mar 23 2022 NAACP statement	00001451_Miami Redistricting.msg	Plaintiff Materials - NAACP	
52	COM24066-060875		3/28/2022	Mar 28 2022 Pierre letter to Mayor Suarez	00001691_Use your veto power.msg	Plaintiff Materials - NAACP	
53	COM24066-060969		3/30/2022	Mar 30 2022 Pierre follow up to Mayor Suarez	00001910_Re_Use your veto power.msg	Plaintiff Materials - NAACP	
54	COM24066-045212		2/25/2022	Feb 25 2022 NAACP joint letter to City	Submittal-Carol Jackson-NAACP.pdf	Plaintiff Materials - NAACP	
55	GRACEPLFS0000054		7/13/2017	Engage bylaws	Engage Miami Bylaws - As of Nov 2019.docx.pdf	Plaintiff Materials - Engage	
56	GRACEPLFS0001296		10/7/2023	Engage members by district	Engage Miami Members as of 10_3_23_Miami (1)[99].xlsx	Plaintiff Materials - Engage	
57	GRACEPLFS0000024		6/11/2023	Overtown community meeting flyer	Forum 2023-06-11 at 12.16.09 AM.pdf	Plaintiff Materials	
58	GRACEPLFS0000025		6/2/2023	Coconut Grove community meeting flyer	Forum 2023-06-02 at 9.53.15 PM.pdf	Plaintiff Materials	
59	GRACEPLFS0001278		10/19/2023	Clarice Cooper state ID and voter card	License and Voter Card.jpg	Plaintiff Materials - Cooper	
60	GRACEPLFS0001294		10/13/2023	Yany state ID	Valdes License.jpg	Plaintiff Materials - Valdes	
61	GRACEPLFS0001282		10/12/2023	Jared Johnson state ID	Jared Johnson License.pdf	Plaintiff Materials - Johnson	
62	GRACEPLFS0001263		12/8/2022	Lexi Contreras voter card	voter id card.HEIC	Plaintiff Materials - Contreras	
63	GRACEPLFS0001285		9/28/2023	Steven Miro voter card	IMG_20230928_154043065.jpg	Plaintiff Materials - Miro	
64		24-80	1/1/1997	1997 plan		Maps	
65		24-81	1/1/2003	2003 Plan		Maps	
66		82-22	6/14/2023	2013 Plan (PI remedy version)		Maps	
67		82-23	6/14/2023	2022 Plan (PI remedy version)		Maps	
68		24-84	2/7/2022	Feb. 7, 2022 Draft		Maps	
69		24-85	2/22/2022	Feb. 22, 2022 Draft/Base Plan		Maps	
70		24-86	2022	Russell Sketch		Maps	
71		24-87	2022	Initial Russell Plan		Maps	
72		24-88	2022	Revised Russell Plan		Maps	
73		24-89	2022	Reyes Plan		Maps	
74		24-90	2/10/2023	2022 Precincts with 2022 Plan overlay		Maps	
75		24-91	2/10/2023	Census VTDs with 2022 Plan overlay		Maps	
76		82-24	6/14/2023	2023 Plan		Maps	
77		82-25	6/14/2023	Version 12		Maps	
78		82-26	6/14/2023	D1 alt map (version 14)		Maps	
79		82-27	6/14/2023	D2 alt map		Maps	
80		82-28	6/14/2023	D3 alt map v1		Maps	
81		82-29	6/14/2023	D3 alt map v2		Maps	
82		82-30	6/14/2023	D5 alt map		Maps	
83		82-31	6/14/2023	Areas moved from 2022 Plan to 2023 Plan		Maps	
84		82-32	6/14/2023	Map comparing V12 to 23 plan		Maps	
85		82-33	7/6/2023	Overtown definition maps		Maps	
86		82-38	7/6/2023	2022 Precincts with 2023 Plan overlay		Maps	
87		82-39	7/6/2023	Census VTDs with 2023 Plan overlay		Maps	
88	COM24066-045585		2/8/2012	2012 City VRA memo	Submittal-City Attorney Email.pdf	2013 Process Materials	
89	COM24066-045594		3/12/2012	2012 City redistricting memo	Memo - Redistricting.pdf	2013 Process Materials	

Plfs.' Tr. Ex.	Bates Number	ECF	Doc Date	Description	File Name	Category	Obj. Codes
90	COM24066-045777		2013	2013 Slideshow video	Submittal-Stephen Cody-Presentation (2).mov	2013 Process Materials	
91		24-75	2/14/2013	Feb. 14, 2013 Meeting Minutes		2013 Process Materials	
92		24-77		Report on the Status of Redistricting and Proposed Redistricting Plan		2013 Process Materials	
93		24-78		Final Report Regarding the Proposed Redistricting Plan		2013 Process Materials	
94		24-79		Redistricting Alternatives Compared slide presentation		2013 Process Materials	
95		24-42	11/21/1996	Alfonso Chardy, <i>Rights Group's Suit Wants Miami to Change Election System</i> , Mia. Herald, Nov. 21, 1996, at 2B		1997 Cycle News Coverage	
96		24-43	12/30/1996	Karen Branch, <i>Miami Group Pushing Hard for Single-Member Districts</i> , Mia. Herald, Dec. 30, 1996, at 12A		1997 Cycle News Coverage	
97		24-44	1/20/1997	Karen Branch, <i>Single-Member Districts Touchy Issue at City Hall</i> , Mia. Herald, Jan. 20, 1997, at 2B		1997 Cycle News Coverage	
98		24-45	3/13/1997	Manny Garcia, <i>Giving Miami Blacks a Voice</i> , Mia. Herald, Mar. 13, 1997, at 1A		1997 Cycle News Coverage	
99		24-46	3/14/1997	Manny Garcia, <i>Election Remap for Miami</i> , Mia. Herald, Mar. 14, 1997, at 12A		1997 Cycle News Coverage	
100		24-47	3/15/1997	<i>Panel Named to Draw Miami Districts</i> , Mia. Herald, Mar. 15, 1997, at 2B		1997 Cycle News Coverage	
101		24-48	3/15/1997	Editorial, <i>Where to Draw the Line</i> , Mia. Herald, Mar. 15, 1997, at 10A		1997 Cycle News Coverage	
102		24-49	5/5/1997	Karen Branch, <i>Professors Get Election Homework</i> , Mia. Herald, May 5, 1997, at 2B		1997 Cycle News Coverage	
103		24-50	6/19/1997	Alfonso Chardy, <i>Blue-Ribbon Panel Picks 2 Plans for Redrawing Districts</i> , Mia. Herald, June 19, 1997, at 1B		1997 Cycle News Coverage	
104		24-51	6/24/1997	<i>Plan to Expand Miami Commission Draws Public Support</i> , Mia. Herald, June 24, 1997, at 2B		1997 Cycle News Coverage	
105		24-52	6/25/1997	Karen Branch, <i>Super-Strong Mayor for Miami?</i> , Mia. Herald, June 25, 1997, at 1B		1997 Cycle News Coverage	
106		24-53	6/27/1997	Karen Branch, <i>Miami Leaders Divided Over Redistricting Plan</i> , Mia. Herald, June 27, 1997, at 3B		1997 Cycle News Coverage	
107		24-54	6/29/1997	Karen Branch, <i>Districts: Back to Drawing Board</i> , Mia. Herald, June 29, 1997, at 1B		1997 Cycle News Coverage	

Plfs.' Tr. Ex.	Bates Number	ECF	Doc Date	Description	File Name	Category	Obj. Codes
108		24-55	7/2/1997	Karen Branch, <i>Miami Commission Leans Toward 5-Member Panel</i> , Mia. Herald, July 2, 1997, at 1B		1997 Cycle News Coverage	
109		24-56	7/3/1997	Karen Branch, <i>Voting Districts to be Chosen Today</i> , Mia. Herald, July 3, 1997, at 4B		1997 Cycle News Coverage	
110		24-57	7/3/1997	Editorial, <i>Go for Seven</i> , Mia. Herald, July 3, 1997, at 22A		1997 Cycle News Coverage	
111		24-58	7/4/1997	Karen Branch, <i>Commissioners Choose 5-Seat Plan</i> , Mia. Herald, July 4, 1997, at 1B		1997 Cycle News Coverage	
112		24-59	7/11/1997	Karen Branch, <i>Miami Commission OKs 5 Voting Districts</i> , Mia. Herald, July 11, 1997, at 1B		1997 Cycle News Coverage	
113		24-60	7/12/1997	Liz Balmaseda, <i>Commission's Districting Logic Is Hard to Digest</i> , Mia. Herald, July 12, 1997, at 1B		1997 Cycle News Coverage	
114		24-61	7/14/1997	Enrique Patterson, <i>Power Games Rob African Americans</i> , Mia. Herald, July 14, 1997, at 13A		1997 Cycle News Coverage	
115		24-62	7/20/1997	Jim Hampton, <i>Schizoid Choices? No, It's Just Miami</i> , Mia. Herald, July 20, 1997, at 2L		1997 Cycle News Coverage	
116		24-63	9/5/1997	Andres Viglucci, <i>Abolition Attempt Crushed</i> , Mia. Herald, Sep. 5, 1997, at 1A		1997 Cycle News Coverage	
117		24-64	9/5/1997	Karen Branch & Dan Keating, <i>Vote Favors a Black Commissioner</i> , Mia. Herald, Sep. 5, 1997, at 1B		1997 Cycle News Coverage	
118		24-65	11/5/1997	Andres Viglucci, <i>Teele Wins Miami Seat</i> , Mia. Herald, Nov. 5, 1997, at 1B		1997 Cycle News Coverage	