

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:24-cv-21983-JB

CUBANOS PALANTE, *et al.*,

Plaintiffs,

v.

FLORIDA HOUSE OF REPRESENTATIVES
and CORD BYRD, in his official capacity as
Florida Secretary of State,

Defendants.

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF
TIME TO SERVE EXPERT DISCLOSURES AND COMPLETE DISCOVERY**

Pursuant to Federal Rule of Civil Procedure 16(b)(4), Defendants, the Florida House of Representatives and Secretary of State Cord Byrd, respectfully move the Court for a brief extension of time to serve expert disclosures and to complete discovery.

1. On March 21, 2025, Plaintiffs served three expert reports. The three expert reports total 163 pages, exclusive of appendices, and present more than a dozen alternative district maps and many statistical analyses.

2. Under the Court's current schedule, Defendants must serve their expert disclosures by May 5, 2025. ECF No. 98 at 1. Plaintiffs must serve their rebuttal expert disclosures by June 4, 2025. *Id.* The parties' deadline to complete discovery is July 2, 2025. *Id.*

3. A brief extension of these deadlines will afford Defendants sufficient time to review and analyze Plaintiffs' expert disclosures and to prepare and serve their own expert disclosures. The volume of Plaintiffs' expert disclosures and the complex nature of the statistical analyses presented in those disclosures support the requested extension, as do scheduling limitations and competing commitments such as the ongoing legislative session, which is scheduled to adjourn on May 2, 2025—only three days before Defendants must serve their expert disclosures.

4. This Court may for “good cause” modify the schedule established in this case. Fed. R. Civ. P. 16(b)(4). The authority of federal district courts to control their dockets “includes broad discretion in deciding how best to manage the cases before them.” *Smith v. Psychiatric Sols., Inc.*, 750 F.3d 1253, 1262 (11th Cir. 2014) (internal marks omitted).

5. Defendants therefore respectfully request a 15-day extension of time through **May 20, 2025**, to serve their expert disclosures. To accommodate that request, Defendants further request a corresponding 15-day extension of time through **June 20, 2025**, for Plaintiffs to serve their rebuttal expert disclosures and a brief extension of the parties' deadline to complete discovery through **July 18, 2025**.

6. These extensions will not require an extension of any other deadlines established by the Court, including the deadline on August 1, 2025, to file motions for summary judgment and motions to exclude or limit proposed expert testimony. *See* ECF No. 98 at 1–2.

7. This extension is sought in good faith and not for purposes of delay.

8. A proposed order is attached as Exhibit A.

WHEREFORE, Defendants respectfully move the Court for a brief extension of time to serve expert disclosures and to complete discovery.

CERTIFICATE OF GOOD-FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), I certify that Defendants' counsel has conferred with Plaintiffs' counsel in a good-faith effort to resolve the issues presented in this motion. Plaintiffs do not oppose the requested relief.

Dated March 31, 2025.

Respectfully submitted,

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Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:24-cv-21983-JB

CUBANOS PA'LANTE, *et al.*,

Plaintiffs,

v.

THREE-JUDGE COURT

FLORIDA HOUSE OF REPRESENTATIVES
and CORD BYRD, in his official capacity as
Florida Secretary of State,

Defendants.

**ORDER GRANTING EXTENSION OF TIME TO SERVE
EXPERT DISCLOSURES AND TO COMPLETE DISCOVERY**

THIS CAUSE came before the Court on Defendants' Unopposed Motion for Extension of Time to Serve Expert Disclosures and Complete Discovery (the "Motion"). ECF No. [__]. Upon due consideration of the Motion and the record, it is hereby **ORDERED AND ADJUDGED** that the Motion is **GRANTED**. Defendants shall serve their expert disclosures by **May 20, 2025**. Plaintiffs shall serve their rebuttal expert disclosures by **June 20, 2025**. All discovery shall be completed by **July 18, 2025**. This Court's Scheduling Order, ECF No. [98], shall otherwise remain in full force and effect.

DONE AND ORDERED this ___ day of _____ 2025.

BRITT C. GRANT
UNITED STATES CIRCUIT JUDGE

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

JACQUELINE BECERRA
UNITED STATES DISTRICT JUDGE