

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

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

CUBANOS PA'LANTE, *et al.*,

Plaintiffs,

v.

FLORIDA HOUSE OF
REPRESENTATIVES, *et al.*,

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO SERVE CERTAIN REBUTTAL EXPERT DISCLOSURES**

Plaintiffs respectfully move for a brief extension of time to serve certain rebuttal expert disclosures.

1. On May 20, 2025, Defendants served their expert reports. The two reports total 127 pages, with an additional 273 pages of appendices, and present many analyses that both rebut Plaintiffs' initial expert reports and also present new arguments, data, and analysis.

2. Under the Court's current schedule, Plaintiffs must serve their rebuttal expert disclosures by June 20, 2025. ECF No. 98 at 1.

3. Multiple of Plaintiffs' experts have limited availability during the week of June 16–20, due to other professional obligations. A brief extension of this deadline will afford Plaintiffs sufficient time to prepare and serve rebuttal reports.

4. The Court may for "good cause" modify the case schedule. FRCP 16(b)(4). Federal district courts have "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. Plaintiffs therefore request a 1-business-day extension of time to **June 23, 2025** to serve their rebuttal expert disclosures, except for the rebuttal report of Dr. Carolyn Abbott.

6. This extension is sought in good faith and not for purposes of delay. Defendants do not oppose the requested extension, and no party will be prejudiced if it is granted.

WHEREFORE, Plaintiffs respectfully request an extension of time to **June 23, 2025** to serve their rebuttal expert disclosures, except for the rebuttal report of Dr. Carolyn Abbott.

LOCAL RULE 7.1(a)(3) CERTIFICATE OF CONFERRAL

Plaintiffs' counsel has conferred with the counsel for Defendants, who do not oppose the requested relief.

Respectfully submitted June 2, 2025,

/s/ Nicholas L.V. Warren

Nicholas L.V. Warren (FBN 1019018)
Daniel B. Tilley (FBN 102882)
Caroline A. McNamara (FBN 1038312)
ACLU Foundation of Florida, Inc.
4343 West Flagler Street, Suite 400
Miami, FL 33134 (786) 363-1769
nwarren@aclufl.org dtilley@aclufl.org
cmcnamara@aclufl.org

Andrew Frackman*
O'Melveny & Myers LLP
1301 Avenue of the Americas
17th Floor
New York, NY 10019 (212) 326-2000
afrackman@omm.com

**Admitted pro hac vice*

Jorge L. Vasquez, Jr.*
Vasquez Attorneys at Law, PC
141 Parkway Road, Suite 14
Bronxville, NY 10708 (212) 752-8408
jorge@vasquezpc.com

Brian P. Quinn*
Patrick J. Jones*
Emily Murphy*
Gabrielle S. Jackson*
Andrea Ojeda*
O'Melveny & Myers LLP
1625 Eye Street NW
Washington, DC 20006
(202) 383-5300 bquinn@omm.com
pjones@omm.com emurphy@omm.com
gjackson@omm.com
aojeda@omm.com

Counsel for Plaintiffs