

**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.*

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**PLAINTIFFS' AND FLORIDA HOUSE OF REPRESENTATIVES'  
JOINT MOTION TO EXTEND DEADLINE  
TO ANSWER REQUESTS FOR ADMISSIONS**

Plaintiffs and Defendant the Florida House of Representatives respectfully move to extend Plaintiffs' deadline to serve answers to the House's Second, Third, Fourth, and Fifth Requests for Admission ("RFAs").

1. The House served these four sets of RFAs on May 27, June 11, June 16, and June 18, 2025, respectively. The four sets encompass 246 requests.

2. On June 26, Plaintiffs served their answers to the Second RFAs, which included 93 requests. Out of the 93 requests, Plaintiffs admitted all or part of 61 requests and stated that they were unable to admit or deny the remainder after a reasonable inquiry.

3. The House and Plaintiffs subsequently conferred about the sufficiency of Plaintiffs' responses to the requests in the Second RFAs that, in whole or in part, Plaintiffs did not admit or deny. To resolve the issue without court intervention, Plaintiffs and the House agreed that Plaintiffs would answer those requests by August 22, 2025, notwithstanding that the current discovery deadline is July 18, 2025. ECF No. 101.

4. The House and Plaintiffs further agreed that Plaintiffs would serve their responses to the Third, Fourth, and Fifth RFAs on August 22, 2025, as well.

5. The House and Plaintiffs submit this joint motion to codify and seek the Court's approval of their resolution of a good-faith discovery conferral.

6. This Court may for "good cause" modify the schedule established in this case. FRCP 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).

7. The requested extension will give Plaintiffs adequate time to research and respond to the House's RFAs. An extension will also permit the parties to focus on the 18 depositions occurring in the final month of the discovery period and any subsequent summary-judgment briefing. These reasons are good cause for an extension.

8. The relief requested in this motion will not otherwise extend discovery, delay this litigation, or postpone other deadlines.

**WHEREFORE**, the House and Plaintiffs respectfully request that the Court extend the deadline for Plaintiffs to serve responses to the House's Second, Third, Fourth, and Fifth Requests for Admission to August 22, 2025.

Respectfully submitted July 7, 2025,

/s/ Andy Bardos

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