

**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.

JOINT STIPULATION REGARDING ILLUSTRATIVE AIDS

1. **Disclosure of Illustrative Aids.** The parties agree that Illustrative Aids as defined under Federal Rule of Evidence 107 need not be exchanged when initial trial exhibit lists are to be exchanged.

2. **Timing for Disclosure.** The parties agree to provide copies of Illustrative Aids to all other parties no later than 48 hours before the start of the proceedings on the day the introducing party plans to use the Illustrative Aid in Court. For example, if a party plans to call a witness on a Wednesday when proceedings are expected to begin at 9:00 a.m., the party will disclose Illustrative Aids for that witness by 9:00 a.m. the preceding Monday morning.

3. **Cross Examination Illustrative Aids.** Illustrative Aids to be used during cross examinations are subject to the 48-hour disclosure rule described supra in ¶ 2.

4. **Objections to Illustrative Aids.** The parties agree to notify the other parties (by email or otherwise) of any objections to disclosed Illustrative Aids no later than 24 hours before the start of the proceedings on the day the introducing party plans to use the Illustrative Aid in Court so that any remaining disputes may be timely resolved. The parties will make good-faith efforts to resolve any objections to an Illustrative Aid. This paragraph does not preclude any objection that could not reasonably have been made by the objection deadline (*e.g.*, an objection that, at the time the Illustrative Aid is used in Court, the evidence that the Illustrative Aid explicates has not been admitted).

5. **Aids In Connection with Opening and Closing Statements.** The parties agree that slide decks, graphics, or other illustrations accompanying closing arguments will not be considered Illustrative Aids. Slide decks, graphics, or other illustrations to be used in closing

argument need not be disclosed in advance of their use.

6. **Blow-Ups, Call-Outs, or Highlights.** The parties need not disclose in advance blow-ups, call-outs, or highlighted/underlined portions of exhibits or testimony.

7. **Reproductions of Illustrative Aids.** The party offering an Illustrative Aid will provide a color representation of the Illustrative Aid to opposing counsel in PDF form before offering it. However, for video or animations, the party seeking to use the Illustrative Aid will provide it to opposing counsel via file transfer or other effective electronic means agreed-upon by the parties. For irregularly sized Illustrative Aids, the party seeking to use the Illustrative Aid will provide a color representation as a PDF of 8.5 in x 11 in.

Respectfully submitted December 19, 2025,

/s/ Andy Bardos

Andy Bardos (FBN 822671)
andy.bardos@gray-robinson.com
GrayRobinson, P.A.
301 South Bronough Street, Suite 600
Tallahassee, Florida 32301-1724
Telephone: 850-577-9090

Christopher M. Kise (FBN 855545)
ckise@continentalpllc.com
Continental PLLC
101 North Monroe Street, Suite 750
Tallahassee, Florida 32301
Telephone: 850-270-2211

Jesus M. Suarez (FBN 60086)
jsuarez@continentalpllc.com
Carmen Manrara Cartaya (FBN 73887)
ccartaya@continentalpllc.com
Jennifer Marie Hernandez (FBN 1018836)
jhernandez@continentalpllc.com
Continental PLLC
245 Alcazar Avenue
Coral Gables, Florida 33134
Telephone: 305-677-2707

Attorneys for Defendant
Florida House of Representatives

/s/ Helena M. Li

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

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

Andrew Frackman*
O'Melveny & Myers LLP
1301 Avenue of the Americas, 17th Floor
New York, NY 10019
(212) 326-2000
afrackman@omm.com
Brian P. Quinn*
Patrick J. Jones*
Emily Murphy*
Gabrielle S. Jackson*
Helena Li*

/s/ Mohammad O. Jazil

Ashley Davis (FBN 48032)

Florida Department of State

R.A. Gray Building

500 South Bronough Street

Tallahassee, FL 32399

(850) 245-6536

ashley.davis@dos.myflorida.com

Mohammad O. Jazil (FBN 72556)

Holtzman Vogel Baran

Torchinsky & Josefiak PLLC

119 South Monroe Street, Suite 500

Tallahassee, FL 32301

(850) 270-5938

mjazil@holtzmanvogel.com

Attorneys for Defendant

Florida Secretary of State

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

hli@omm.com

**Admitted pro hac vice*

Attorneys for Plaintiffs