

**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' AMENDMENT TO SCHEDULING REPORT**

The parties submitted their Joint Scheduling Report on July 16, 2024 (ECF No. 34). Under Federal Rule of Civil Procedure 16(b)(2), a scheduling order was due on July 30, 2024 (60 days after the first defendant appeared, *see* ECF No. 21), “unless the [Court] finds good cause for delay.”

Plaintiffs notify the Court that, absent a scheduling order, the parties have so far adhered to their proposed discovery plan. However, Plaintiffs plan to serve their expert disclosures by September 6, 2024—one week after the date proposed in the Joint Scheduling Report (August 30, 2024). Plaintiffs therefore request that the Court set that deadline **one week** later than in our initial proposed schedule and set the other expert-related deadlines accordingly. Consistent with the Joint Scheduling Report, Plaintiffs propose that Defendants’ expert disclosures be due 60 days later; Defendants propose their expert disclosures be due 90 days later. The parties agree Plaintiffs’ rebuttal expert reports should be due 30 days after Defendants’ expert disclosures.

Additionally, Plaintiffs request extending the deadline to join other parties and to amend the pleadings by **two weeks**, to a new deadline of September 27, 2024.

Plaintiffs believe that no other changes are needed to the proposed deadlines in the joint scheduling report. Plaintiffs remain available for a scheduling conference if the Court believes one is necessary in this case.

Plaintiffs conferred with all other parties pursuant to Loc. R. 7.1(a)(3). Counsel for Defendant Secretary of State does not oppose the requested amendments. Counsel for the House of Representatives expressed no position.

Respectfully submitted August 27, 2024,

/s/ Caroline A. McNamara

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