

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

Common Cause Florida, FairDistricts
Now, Florida State Conference of the
National Association for the
Advancement of Colored People
Branches, Cassandra Brown, Peter
Butzin, Charlie Clark, Dorothy Inman-
Johnson, Veatrice Holifield Farrell,
Brenda Holt, Rosemary McCoy, Leo R.
Stoney, Myrna Young, and Nancy
Ratzan,

Plaintiffs,

v.

Cord Byrd, in his official capacity as
Florida Secretary of State,

Defendant.

Case No.: 4:22-cv-109-AW-MAF

PLAINTIFFS' UNOPPOSED MOTION FOR STATUS CONFERENCE

Plaintiffs Common Cause Florida, FairDistricts Now, Florida State
Conference of the National Association for the Advancement of Colored People
Branches, Cassandra Brown, Peter Butzin, Charlie Clark, Dorothy Inman-Johnson,
Veatrice Holifield Farrell, Brenda Holt, Rosemary McCoy, Leo R. Stoney, Myrna
Young, and Nancy Ratzan (collectively the "Plaintiffs"), respectfully move for a
status conference with the Court. The grounds for this motion and the proposed

matters to be discussed at the status conference are set forth in the following memorandum. The Defendant Cord Byrd does not oppose this motion.

MEMORANDUM IN SUPPORT OF MOTION

Rule 16 permits the Court to schedule a status conference for purposes of discussing issues regarding management and disposition of the action. *See* Fed. R. Civ. P. 16(a). Plaintiffs respectfully request the opportunity to appear before the Court to discuss matters within the scope of the Rule, including:

1. The status of three pending and related discovery motions (Docket Entries 126, 128, and 137) in this matter. These motions seek to quash deposition subpoenas and argue that the subpoena recipients cannot be deposed due to various privileges.

2. The status of discovery in this case in light of the upcoming discovery deadline of June 3, 2023. Because of the pending motions to quash, Plaintiffs have not yet scheduled or taken any depositions, and will not be able to do so until the motions are decided. Plaintiffs anticipate that it will be difficult to meet the discovery deadline if they are not able to schedule and prepare for depositions in the near future.

The parties believe that thirty minutes will be adequate for this status conference.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(F)

I certify that this motion complies with the type-volume limitation set forth in Local Rule 7.1(F) because it contains 273 words, excluding the parts exempted by Local Rule 7.1(F).

LOCAL RULE 7.1(B) CERTIFICATION

Counsel for Plaintiffs has conferred with counsel for Defendant on Defendant's position on this motion. Defendant does not oppose this motion.

Date: May 3, 2023

Respectfully submitted,

PATTERSON BELKNAP WEBB
& TYLER LLP

/s/ Gregory L. Diskant

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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2023, I electronically filed the foregoing with the Clerk of Court by using CM/ECF, which automatically serves all counsel of record for the parties who have appeared.

/s/ Gregory L. Diskant

Gregory L. Diskant