

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

**CONGRESSWOMAN CORRINE BROWN,
JOHNNY BROWN, THEODORE BROWN,
MARY LAWSON BROWN, MARY L. GEORGE,
CRYSTAL R. BROWN, JUSTIN CAMPBELL,
FERRILL HILL, MARGIE KELLY CODY,
JOSEPHINE HALL, SANDRA JACKSON,
MAMIE JACKSON, WILFRED W. REDDICK,
JR., SHANTEZ ROBINSON, CARRIE DAVIS,
JEAN REDDICK, ALVIN SHEPARD, CURTIS
WALKER, PHYLLIS JOHNSON, JEROME
BROWN, JOANN M. BROWN, HAZEL D. GILLIS,
ANTONIA G. BRYANT, EULIE B. JOHNSON,
LAVONNE P. MITCHELL, DARRYL MACK,
ANTHONY MACK, DORETHA MACK, CONSTANCE
S. HALL, SHAKUR ALI, MICHAEL ASHLEY,
LAWRENCE AVERBECK, ANITA BAILEY, LEON
BERRIER, DANIEL L. COLE, JASMINE CROMWELL,
TRICIA DUNLAP, LA' DAISHA EVANS, JAMES
FREEMAN, RUSSELL T. GASKIN, CLARETHA S.
HICKS, TEVIN HENDERSON, MITZI HUTCHINSON,
ANGELIQUE MATTHEWS, ANNA MCLAUGHLIN,
EDWIN MERRITT, LILLIE P. POWELL, TAURICE
RICKS, DEVIN ROBERTS, CARY P. ROBINSON,
ALEXANDRA SAFFICE, SHAKA SHABAZZ, FELICIA
SMITH, RICHARD ALAN SPAULDING, WILLIE
THOMAS, TEAONNDA THOMPSON, RODERIC
TURNER, MARY S. ADAMS, JOY GREGORY, WILBERT
GREGORY, CARLOTTA L. GUYTON, LUELLA
MCQUEEN, DOROTHY M. OLIVER, JACOBY
PITTMAN, BARON RIVERS, KIMBERLY RIVERS,
ANMENIA SHAHAB, NEEMA YA NATHIERI,
MELVIN A. PHILPOT, VELMA WILLIAMS,
BEVERLYE COLSON NEAL, TYRONE FIELDS,
GLORIA R. GREEN, MAXINE S. HIXON, REBECCA
JOHNSON, NEVA SPANN-KIRKLAND, SUSIE L.
JOHNSON HARRIS, EDDIE L. JAMES, BENTLEY
M. CAREY, DWYCE L. ROSS, KENNETH WALKER,
TIFFANY WARE, VANESSA WILLIAMS, CHARITA FINCH,**

Case No.: 4:15-cv-00398-MW-CAS

LAVENIA MAY, DR. ROLOUS A. FRAZIER, JR., DOROTHY FLUITT, SHEILA B. SMITH, CLARISE REDDICK, DAISY BALES, CONSTANCE BANGO, DELORIS R. SHEPHERD, VERNON MCQUEEN, HERBERT WILLIAMS JR., ROD ZEIGLER, ROYCE FLAGLER, MABLE BUTLER, JEAN CAMPBELL, WILLIE CAMPBELL, ELLA MAE CAMPBELL, KALEIGH CAMPBELL, MIA CAMPBELL, WALTER DULES WILLIAMS, LULA COOKS WILLIAMS, ROBERTA WILLIAMS, DANIEL J. WILLIAMS, IDA M. CARSON, JUANITA SANDERS, CHERYLL DANIELS, EDDIE A. BENN, RICH SLEET, MARIA T. BARNES, ALLEN WIGGINS, HENRIETTA J. TICE, JASMINE MCKAY, LATOYA DAVIS, AND LULA DAVIS,

Plaintiffs,

vs.

**KEN DETZNER, in his official capacity as
Secretary of State of the State of Florida,
THE FLORIDA SENATE and THE
FLORIDA HOUSE OF REPRESENTATIVES,**

Defendants.

**PLAINTIFFS' NOTICE OF FILING EXPERT DECLARATION AND INTENTION NOT
TO FILE SUPPORTING MEMORANDUM**

Plaintiffs, by and through undersigned counsel, hereby file a declaration prepared by Dr. Richard Engstrom and state as follows:

1. On January 13, 2016 this Court entered its Order Setting the Preliminary-Injunction Schedule.
2. In its scheduling order, this Court allowed Plaintiffs to file an expert declaration and supplemental memorandum in support of their Motion for Preliminary Injunction.

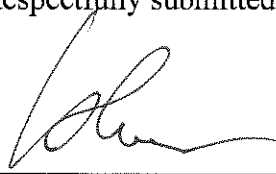
3. Pursuant to the leave granted by this Court, Plaintiffs hereby introduce the expert declaration of Dr. Richard Engstrom, Attached hereto, into the written record for their Motion for Preliminary Injunction.

4. As Dr. Engstrom's declaration relies on data used in the report he prepared for prior proceedings in state court, Plaintiffs also give notice that Dr. Engstrom's Report in the prior litigation, formerly introduced into the record as Exhibit A to Plaintiff's Amended Motion for Preliminary Injunction (Doc. 48), had been introduced into the record.

5. Plaintiffs also give notice that they do not intend to file a supplemental memorandum.

WHEREFORE, Plaintiffs hereby give notice of filing the Declaration of Dr. Richard Engstrom and give notice that they do not intend to file a supplemental memorandum.

Respectfully submitted,



Wm. J. Sheppard, Esquire
Florida Bar No.: 109154
Bryan E. DeMaggio, Esquire
Florida Bar No.: 055712
Sheppard, White, Kachergus & DeMaggio, P.A.
215 Washington Street
Jacksonville, Florida 32202
Telephone: (904) 356-9661
Facsimile: (904) 356-9667
Email: sheplaw@att.net
COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February ¹²/₁₂, 2016, I electronically filed the foregoing with the Clerk of the Court by using CM/ECF System which will send a notice of electronic filing to the following:

**Adam S. Tanenbaum, Esquire
General Counsel
Florida Department of State
500 South Bronough Street, Suite 100
Tallahassee, Florida 32399-0250**

**David A. Fugett, Esquire
Assistant General Counsel
Florida Department of State
500 South Bronough Street, Suite 100
Tallahassee, Florida 32399-0250**


**Jason N. Zakia, Esquire
Jesse L. Green, Esquire
Raoul G. Cantero, Esquire
Wachovia Financial Center
Suite 4900
200 South Biscayne Boulevard
Miami, Florida 33131**

**Andy V. Bardos, Esquire
Gray Robinson, P.A.
301 South Bronough Street, Suite 600
Tallahassee, Florida 32301**

**David B. King, Esquire
Thomas A. Zehnder, Esquire
Vincent Falcone III, Esquire
King Blackwell Zehnder, et al.
25 East Pine Street
Orlando, Florida 32801**

I HEREBY CERTIFY that on February th 2, 2016, a true and correct copy of the foregoing document and the notice of electronic filing was sent by United States Mail to the following non-CM/ECF participants:

N/A



ATTORNEY