

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.04-22572-CIV-KING

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EMMA YAIZA DIAZ; JOHN A. LANMAN;	:
AMERICAN FEDERATION OF LABOR AND	:
CONGRESS OF INDUSTRIAL	:
ORGANIZATIONS; AMERICAN FEDERATION	:
OF STATE, COUNTY AND MUNICIPAL	:
EMPLOYEES, AFL-CIO; FLORIDA PUBLIC	:
EMPLOYEES COUNCIL 79, AFSCME, AFL-CIO	:
and SERVICE EMPLOYEES INTERNATIONAL	:
UNION,	:
	:
Plaintiffs,	:
	:
vs.	:
	:
KURT S. BROWNING, Secretary of State of	:
Florida; BRENDA C. SNIPES, Broward County	:
Supervisor of Elections; JERRY HOLLAND, Duval	:
County Supervisor of Elections; LESTER SOLA,	:
Miami-Dade County Supervisor of Elections; BILL	:
COWLES, Orange County Supervisor of Elections;	:
and ARTHUR ANDERSON, Palm Beach County	:
Supervisor of Elections,	:
	:
Defendants.	:
	:
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PLAINTIFFS' RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.1, plaintiffs Emma Yaiza Diaz, John A. Lanman, American Federation of Labor and Congress of Industrial Organizations ("AFL-CIO"), American Federal of State, County and Local Employees, AFL-CIO ("AFSCME"), Florida Public Employees Council 79, AFSCME, AFL-CIO ("Council 79"), and Service Employees International Union, AFL-CIO ("SEIU") (collectively, "plaintiffs"), by their attorneys make the following initial disclosures.

These initial disclosures reflect the current knowledge of plaintiffs and their counsel, and are subject to, and are made without waiving, plaintiffs' rights to assert any and all objections as to competency, relevancy, materiality, privilege, work-product, use, or admissibility as evidence, for any purpose, of any of these initial disclosures, or of the subject matter of these initial disclosures, in these or any subsequent proceedings. Plaintiffs further reserve the right to supplement, amend, correct, or otherwise modify these initial disclosures as investigation and discovery are conducted.

I. Individuals Likely to Have Discoverable Information

Subject to the reservation of all rights and privileges described above, plaintiffs hereby provide the name of each individual likely to have discoverable information relating to the material allegations of the Third Amended Complaint, unless solely for impeachment, and hereby identify the subjects of that information.

Name	Address	Subject
Emma Yaiza Diaz	c/o Michael Halberstam, Esq. Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019	Knowledge relating to her voter registration application.
John A. Lanman	c/o Michael Halberstam, Esq. Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019	Knowledge relating to his voter registration application.
Dennis D. Graham	c/o Michael Halberstam, Esq. Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019	Knowledge regarding certain incomplete voter registration applications.
Robert Hauptman	c/o Michael Halberstam, Esq. Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019	Knowledge regarding certain incomplete voter registration applications.

Richard F. Carlberg	Unknown	Knowledge of grace period provided by Duval County in 2004.
Ion Sancho	Unknown	Knowledge concerning voter registration process.

II. Categories of Documents, Data Compilations, and Tangible Things To Be Produced

Subject to the reservation of all rights and privileges described above, plaintiffs hereby provide the following description by category of documents, data compilations, and tangible things in their possession, custody, or control that they may use to support their claims:

No.	Category	Location
1.	Information pertaining to certain voter registration applications that were deemed incomplete in the 2004 and 2006 primaries and general elections.	New York, NY
2.	Information pertaining to efforts to complete voter registration applications by certain applicants whose applications were deemed incomplete.	New York, NY
3.	Certain information from public records relating to incomplete voter registration applications.	New York, NY

III. Damages

Pursuant to Fed. R. Civ. P. 26(a)(1)(A), and subject to the reservation of all rights and privileges described above, plaintiffs state that all plaintiffs seek nominal damages.

IV. Insurance Agreements

Inapplicable.

Dated: New York, NY
April 26, 2007

PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP



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Attorney for Plaintiffs

* *Pro hac vice* application pending
** Admitted *pro hac vice*