

UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-22572-CIV-KING

EMMA YAIZA DIAZ; 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.

SECRETARY OF STATE'S RULE 26(a)(1) SUPPLEMENTAL DISCLOSURES

Pursuant to Rules 26(a)(1) and 26(e), Federal Rules of Civil Procedure, Kurt S.

Browning, Secretary of State of the State of Florida (the "Secretary"), submits these
supplemental disclosures:

A. The name and, if known, the address and telephone number of each individual likely to
have discoverable information that the disclosing party may use to support its claims or
defenses, unless solely for impeachment, identifying the subjects of the information:

- Pat Hollarn, Supervisor of Elections, Okaloosa County, Florida, 302 Wilson

Street, North, Crestview, Florida 32536-3440 – Knowledge regarding the voter

registration process.

- All witnesses deposed in this litigation.

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

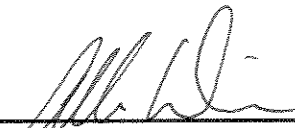
- Any documents produced by any party in this litigation.

These initial disclosures are based on information reasonably available to the Secretary at this time. The Secretary may discover additional facts that further support his defense.

Accordingly, the Secretary reserves the right to supplement or correct the information set forth in these disclosures, and to present witnesses, documents and evidence in addition to that which is disclosed herein.

The inclusion of a witness or document in this disclosure is not an admission by the Secretary that any or all of the witnesses' testimony, or the document identified, are or would be admissible or relevant for any purpose. These initial disclosures are made without waiving any right to object to the production of any document or information on any ground, including, but not limited to, the attorney-client privilege, the work product doctrine, relevancy, and undue burden.

Respectfully submitted this 6th day of September, 2007.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing has been served by U.S. Mail this 6th day of September, 2007, to the following:

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