

UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-22572-CIV-KING/O'SULLIVAN

EMMA YAIZA DIAZ; AMERICAN
FEDERATION OF LABOR AND CONGRESS
OF INDUSTRIAL ORGANIZATIONS;
AMERICAN FEDERAL OF STATE, COUNTY
AND LOCAL EMPLOYEES, AFL-CIO;
FLORIDA PUBLIC EMPLOYEES COUNCIL
79, AFSCME, AFL-CIO; AND SERVICE
EMPLOYEES INTERNATIONAL UNION,
AFL-CIO,

Plaintiffs,

v.

KURT S. BROWNING, Secretary of State
Of Florida; BRENDA 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.

THE FLORIDA STATE ASSOCIATION OF SUPERVISORS OF ELECTIONS
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' SUBPOENA FOR PRODUCTION OF DOCUMENTS

COMES NOW, the Florida State Association of Supervisors of
Elections ("FSASE"), by and through undersigned counsel and
pursuant to Rules 34 and 45, Federal Rules of Civil Procedure,
files its Responses and Objections to Plaintiffs' amended

subpoena duces tecum, which was served on the FSASE on August 24, 2007, and with respect thereto states as follows:

OBJECTIONS AND RESPONSES TO SUBPOENA DUCES TECUM

1. The FSASE will produce documents responsive to this numbered paragraph of the subpoena duces tecum.

2. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad and unduly burdensome. Without waiving this objection, the FSASE will produce responsive documents, if any in its possession.

3. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession.

4. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession.

5. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this

objection, the FSASE notes that it has no responsive documents in its possession.

. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE will produce documents in its possession, if any.

7. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE will produce documents in its possession, if any.

8. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession.

9. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession.

10. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague,

overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession or control other than the Florida Election Code or matters that are otherwise available from the Defendant State of Florida, Department of State.

11. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession.

12. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession.

13. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession.

14. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this

objection, the FSASE notes that it has no responsive documents in its possession.

15. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome.

16. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession.

17. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession.

18. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this objection, the FSASE notes that it has no responsive documents in its possession.

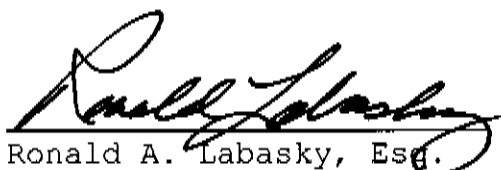
19. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome. Without waiving this

objection, the FSASE notes that it has no responsive documents in its possession.

20. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome.

21. The FSASE objects to this numbered paragraph of the subpoena duces tecum on the grounds that the request is vague, overly broad, and unduly burdensome.

Respectfully submitted this 7th day of September, 2007.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document is being served this 7th day of September, 2007, on all counsel of record identified on the following Service List via electronic mail or facsimile and U.S. Mail or Federal Express*:

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