

UNITED STATES DISTRICT COURT  
THE SOUTHERN DISTRICT OF FLORIDA

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

EMMA YAIZA DIAZ, et al.

Plaintiffs,

v.

KURT S. BROWNING, Secretary of State of  
Florida, et al.

Defendants.

**DEFENDANT DR. BRENDA C. SNIPES, BROWARD COUNTY SUPERVISOR  
OF ELECTIONS, INITIAL DISCLOSURE PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 26**

COMES NOW the Defendant, DR. BRENDA C. SNIPES, BROWARD COUNTY SUPERVISOR OF ELECTIONS ("Defendant Snipes"), by and through its undersigned attorney, and pursuant to Federal Rule of Civil Procedure 26, and hereby makes its initial disclosures as follows:

Rule 26(a)(1)(A) Disclosures:

1. Dr. Brenda C. Snipes, Supervisor of Elections, Broward County, Florida

115 South Andrews Avenue, Room 102  
Fort Lauderdale, FL 33301  
(954) 357-7050

General knowledge of operations of the Broward Supervisor of Elections office, processing of voter registration applications in light of state and federal laws applicable to the book closings; general operating procedures of the office and conduct of elections as it relates to the remaining claim.

2. Bruce Eldridge, Director of Information Services

Broward County Supervisor of Elections  
115 South Andrews Avenue, Room 102  
Fort Lauderdale, FL 33301

General knowledge of procedures for the input of computer and software data; information regarding registration totals reported to State of Florida; computer and software issues as they relate to the processing of voter registration applications, timeframes and notices.

3. Evan Kolodny, Registration Services Director

Broward County Supervisor of Elections  
115 South Andrews Avenue, Room 102  
Fort Lauderdale, FL 33301

General knowledge of general registration information regarding the main office; information regarding public records requests and NVRA sites. General knowledge of voter registration procedures leading up to the close of books prior to elections. The process for providing notice to applicants and Election Day administration.

4. Plaintiffs counsel can confirm the current information according to the records of Defendant Snipes at its main office address below:

Broward County Supervisor of Elections  
115 South Andrews Avenue, Room 102  
Fort Lauderdale, FL 33301

5. Kurt Browning, Florida Secretary of State

Florida Department of State  
R. A. Gray Building  
500 South Bronough Street  
Tallahassee, FL 32399-0250  
Telephone: 850.245.6500

As Florida's Chief Elections Officer, general knowledge of statewide elections procedures, uniformity requirements, and the Florida Voter Registration System.

6. Assistant Secretary of State Dawn Roberts

Florida Department of State  
R. A. Gray Building  
500 South Bronough Street  
Tallahassee, FL 32399-0250  
Telephone: 850.245.6500

As former Director of the Florida Division of Elections, general knowledge of statewide elections procedures, uniformity requirements, and the Florida Voter Registration System.

7. Witnesses identified through discovery and persons, if any, that assisted Plaintiff in identifying persons involved in any way with the remaining claim.
8. Witnesses identified by Plaintiffs in Responses to Interrogatories, as having the most knowledge of voter registration drives for of the Union Plaintiffs, as well as budgeting and purpose of the Union Plaintiffs federally, statewide and in Broward County, Florida.
9. Any members of the Union Plaintiffs in Broward County identified by the Plaintiffs as having a claim under the sole remaining issue relating to the grace period.
10. Any witnesses identified by the other parties that may have information on the claim against Defendant Snipes.

Rule 26(a)(1)(B) Disclosures

1. Defendant Snipes will use all public records produced to the Plaintiffs pursuant to its various public records requests and all documents produced to the Plaintiffs pursuant to their Requests for Production to the Defendants.
2. Any and all public records in Defendant Snipes' possession relating to the named Union Plaintiffs, if applicable.

3. Any documents identified by the other parties that may contain information pertaining to Defendant Snipes.

Rule 26(a)(1)(C) Disclosures: N/A

Rule 26(a)(1)(D) Disclosures: N/A

Dated this 27th day of April, 2007.

BURNADETTE NORRIS-WEEKS, P.A.  
On Behalf of Defendant, Dr. Brenda C. Snipes  
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BY: s/ Burnadette Norris-Weeks  
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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 27, 2007, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices for Electronic filing.

BY: s/ Burnadette Norris-Weeks  
Burnadette Norris-Weeks, Esq.

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