

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 1:26-cv-22257-JB/Torres**

UNIDOSUS, et al.,

*Plaintiffs,*

and

FLORIDA STATE CONFERENCE OF  
BRANCHES AND YOUTH UNITS  
OF THE NAACP, et al.,

*Consolidated Plaintiffs,*

v.

CORD BYRD, in his official capacity as  
Florida Secretary of State, et al.,

*Defendants.*

---

**STATE DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY**

Pursuant to Southern District of Florida Local Rule 7.8, State Defendants provide notice of supplemental authority of the United States Supreme Court's stay order in *DHS v. League of Women Voters*, No. 26A308 (U.S. Sept. 25, 2026). Addressing the impact of the district court's order on the federal government's ability to use the SAVE database to aid voter list maintenance within 90 days of an election, the Court explained that "all agree that the order prevents the Federal Government from using the modified SAVE program to conduct *individualized* inquiries, which are permitted under federal law during this period. The District Court's order thus inhibits the Federal Government's efforts to assist state and local agencies in the proper administration of the midterm elections." Slip Op. at 6. This authority supports State Defendants' argument in their motion to dismiss on NVRA Section 8(c)(2)(A). Doc.120 at 14-15 ("90-Day Systematic List

Maintenance Claim”). Plaintiffs argue that HB 991 violates the 90-day provision because using SAVE is necessarily “systematic.” The Supreme Court made clear that SAVE can be used for individualized voter eligibility inquiries within 90 days of a federal election without violating the NVRA.

Respectfully submitted,

/s/ Mohammad O. Jazil

Mohammad O. Jazil (FBN 72556)  
Martin C. Wolk (FBN 1065532)  
HOLTZMAN VOGEL BARAN TORCHINSKY &  
JOSEFIK PLLC  
119 South Monroe Street, Suite 500  
Tallahassee, FL 32301  
(850) 270-5938  
mjazil@holtzmanvogel.com  
mwolk@holtzmanvogel.com  
kgordon@holtzmanvogel.com

*Counsel for Florida Secretary of State,  
Florida Department of Highway Safety and Motor  
Vehicles Executive Director, and  
Florida Department of Children and Families  
Deputy Secretary*

Dated: October 2, 2026

Ashley E. Davis (FBN 48032)  
General Counsel  
Bilal A. Faruqui (FBN 15212)  
Deputy General Counsel  
FLORIDA DEPARTMENT OF STATE  
R.A. Gray Building  
500 South Bronough Street  
Tallahassee, FL 32399  
(850) 245-6531  
ashley.davis@dos.fl.gov  
bilal.faruqui@dos.fl.gov  
jenna.mclanahan@dos.fl.gov

*Counsel for Florida Secretary of State*

**LOCAL RULE 7.8 CERTIFICATION**

In compliance with Southern District of Florida Local Rule 7.8, the undersigned certifies that this notice of supplemental authority does not exceed 200 words.

/s/ Mohammad O. Jazil  
Mohammad O. Jazil

**CERTIFICATE OF SERVICE**

I certify that on October 2, 2026, I electronically filed the foregoing with the Clerk of Court using CM/ECF, which automatically serves all counsel of record for the parties who have appeared.

/s/ Mohammad O. Jazil  
Mohammad O. Jazil