IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

THE LEAGUE OF WOMEN VOTERS OF FLORIDA; THE NATIONAL COUNCIL OF LA RAZA; COMMON CAUSE FLORIDA; ROBERT ALLEN SCHAEFFER; BRENDA ANN HOLT; ROLAND SANCHEZ-MEDINA, JR.; and JOHN STEEL OLMSTEAD,	)	
Plaintiffs,	)	
vs.	)	CASE NO.:
KURT BROWNING, in his official capacity as Florida Secretary of State; THE FLORIDA SENATE; MICHAEL HARIDOPOLOS, in his official capacity as President of the Florida State Senate; THE FLORIDA HOUSE OF REPRESENTATIVES; and DEAN CANNON, in his official capacity as Speaker of the Florida House of Representatives,	)	
Defendants.	)	

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiffs THE LEAGUE OF WOMEN VOTERS OF FLORIDA, THE NATIONAL COUNCIL OF LA RAZA, COMMON CAUSE FLORIDA, (hereinafter "the Coalition"), ROBERT ALLEN SCHAEFFER, BRENDA ANN HOLT, ROLAND SANCHEZ-MEDINA, JR., and JOHN STEEL OLMSTEAD, hereby allege:

INTRODUCTION

1. On November 2, 2010, the voters of Florida overwhelmingly passed two constitutional amendments providing standards by which the Legislature must abide during each decennial redistricting cycle. These amendments, known as the "FairDistricts Amendments" were intended to prevent partisan and racial gerrymandering, and to protect the traditional redistricting principles of

equal population, compactness, contiguity, and respect for political and geographic boundaries. The addition of these redistricting standards to the Florida Constitution was designed to level the political playing field by ensuring equality among all voters and increasing opportunities for all candidates. *See Brown v. Sec'y of State of Fla.*, No. 11-14554 (11th Cir. Jan. 31, 2012).

2. In voting for these amendments, the voters were responding to decades of political gerrymandering and incumbent protection designed to undermine their ability to elect representatives reflecting their true political preferences. The FairDistricts Amendments passed with 63% of the vote. Accordingly, Article III, Section 20, of the Florida Constitution sets forth fair, objective and nonpartisan standards for the Legislature to follow in Congressional redistricting.

3. On February 9, 2012, the Florida Legislature passed CS/SB 1174, a bill of redistricting for Florida's 27 congressional seats following the 2010 decennial census. CS/SB 1174 ("the Legislature's Congressional Plan"). That plan violates both the intent and the letter of the constitutional requirements of Article III, Section 20.

4. Plaintiffs file this action seeking declaratory and injunctive relief to prevent the implementation and enforcement of the Legislature's Congressional Plan in any future elections. The Legislature's Congressional Plan threatens to harm Plaintiffs' right to a fair and neutral redistricting plan, free of political and racial gerrymandering or incumbent protection efforts. It likewise threatens to deny Plaintiffs' right to a redistricting plan that respects the constitutionally required redistricting principles of compactness and respect for political and geographic boundaries. The injury to these voters and all citizens of Florida, and the deprivation of their rights under Article III, Section 20, caused by the Legislature's Congressional Plan are neither necessary nor justified.

JURISDICTION AND VENUE

5. This Court has jurisdiction over this matter pursuant to Fla. Stat. § 26.012 (2011) and Article V, Section 5(b) of the Florida Constitution. Venue is proper pursuant to Fla. Stat. § 47.011 (2011).

Plaintiffs' action for declaratory and injunctive relief is authorized by Fla. Stat. § 86.011 (2011) as well as Fla. Stat. § 26.012(3) (2011).

PARTIES

Plaintiffs

6. Plaintiffs are citizens and registered voters residing throughout the State of Florida and organizations representing the interests of Floridians who supported the FairDistricts Amendments and will be affected by the Legislature's Congressional Plan.

7. Plaintiff LEAGUE OF WOMEN VOTERS OF FLORIDA is a nonpartisan political organization founded in 1939 to promote active citizenship through informed and engaged participation in government. The League was one of the primary proponents of the FairDistricts Amendments and its members have been actively engaged in the redistricting process. A substantial number of its members will be harmed by the Legislature's Congressional Plan.

8. Plaintiff NATIONAL COUNCIL OF LA RAZA is a Hispanic civil rights and advocacy organization that works to improve opportunities for Hispanic Americans through community-based organizations. It was one of the primary proponents of the FairDistricts Amendments and its members were actively engaged in the redistricting process. A substantial number of its members will be harmed by the Legislature's Congressional Plan.

9. Plaintiff COMMON CAUSE FLORIDA is a nonpartisan, nonprofit advocacy organization dedicated to helping citizens have their voices heard in the political process and hold public officials accountable to the public interest. It was a primary proponent of the FairDistricts Amendments and its members have been actively engaged in the redistricting process. A substantial number of its members will be harmed by the Legislature's Congressional Plan.

10. Plaintiff ROBERT ALLEN SCHAEFFER is a citizen and registered voter in Sanibel, Florida.

11. Plaintiff BRENDA ANN HOLT is a citizen and registered voter in Quincy, Florida.

12. Plaintiff ROLAND SANCHEZ-MEDINA, JR. is a citizen and registered voter in Coral Gables, Florida.

13. Plaintiff JOHN STEEL OLMSTEAD is a citizen and registered voter in Tampa, Florida.

Defendants

14. Defendant KURT BROWNING, Secretary of State for the State of Florida, is the State's chief elections officer. Defendant Browning is responsible for administering and supervising the elections of the United States Representatives from the State of Florida. He is sued in his official capacity.

15. Defendant the FLORIDA SENATE ("Senate") is one house of the Legislature of the State of Florida. Defendant FLORIDA SENATE is responsible for drawing reapportionment plans for the United States Representatives from the State of Florida that comply with the Florida Constitution.

16. Defendant, MICHAEL HARIDOPOLOS, is the President of the Florida State Senate. He is sued in his official capacity. Defendant FLORIDA SENATE is responsible for drawing reapportionment plans for the United States Representatives from the State of Florida that comply with the Florida Constitution.

17. Defendant FLORIDA HOUSE OF REPRESENTATIVES ("House") is the other house of the Legislature of the State of Florida. Defendant FLORIDA HOUSE OF REPRESENTATIVES is responsible for drawing reapportionment plans for the United States Representatives from the State of Florida that comply with the Florida Constitution.

18. Defendant, DEAN CANNON, is the Speaker of the Florida House of Representatives. He is sued in his official capacity. Defendant FLORIDA HOUSE OF REPRESENTATIVES is responsible for drawing reapportionment plans for the United States Representatives from the State of Florida that comply with the Florida Constitution.

FACTUAL ALLEGATIONS

a. *The FairDistricts Amendments*

19. On November 2, 2010, the voters of Florida amended the state constitution by adopting two provisions that provide standards by which the Legislature must abide when drawing state legislative and congressional districts after each decennial census. *See Roberts v. Brown*, 43 So. 3d 673 (Fla. 2010);*Advisory Op. to Att'y Gen. re Standards for Establishing Legislative Dist. Boundaries*, 2 So. 3d 175 (Fla. 2009). These amendments were referred to as the "FairDistricts Amendments" and are now part of Florida's Constitution at Article III, Section 20 (Congressional redistricting) and 21 (Legislative redistricting).

20. Section 20 places new limits on the Legislature's power to draw Congressional district boundaries. Among other important reforms, it provides that districts shall not "be drawn with the intent to favor or disfavor a political party or an incumbent" or "with the intent or result of denying or abridging the equal opportunity of racial or language minorities to participate in the political process or to diminish their ability to elect representatives of their choice." *Id.* § 20(a). The Amendment also requires that unless doing so would violate these provisions, districts be "as nearly equal in population as is practicable," "compact," and "where feasible, utilize existing political and geographical boundaries." *Id*. §20(b). It passed with 63% of the vote.

21. In supporting the Amendment, the voters were responding to a long history of the Florida Legislature's misuse of its power to draw district lines. For decades, the will of Florida's voters was undermined by the Legislature's elimination of competitive districts to guarantee skewed partisan outcomes. Voters were reacting to numerous examples of legislators drawing Congressional districts for themselves to run in.

22. In every statewide election in recent memory, Florida has proven itself to be a state whose voters are split almost evenly between Republican and Democratic candidates. In 2008,

Florida narrowly voted for Barack Obama by 50.9%, while in 2004, 52.1% of Floridians voted for George W. Bush.

23. Nevertheless, because of the Legislature's heretofore unchecked power to strategically draw district lines, the composition of Florida's Congressional delegation reflects a severe partisan imbalance: of Florida's 25 current Congressional seats, 19 are held by Republicans – the party that controlled the last redistricting process. Only six seats (24%) are held by Democrats.

24. Not only do Florida's congressional seats reflect a severe partisan imbalance, they are also extremely safe for their incumbents. In 2010, only 7 of the 25 congressional races were decided by margins of less than 20%.[1]

25. Because the Amendments limit legislators' ability to use the redistricting process for their own political advantage, the political establishment has sought to invalidate them at every possible turn. First, the Florida Legislature asked that the Florida Supreme Court not permit the amendments to be placed on the ballot. *SeeAdvisory Op. to Att'y Gen. re Standards for Establishing Legislative Dist. Boundaries*, 2 So. 3d 175 (Fla. 2009).After the Amendments had been officially placed on the November 2010 ballot, the Florida House of Representatives and the Florida Senate, along with two incumbent members of Congress, brought suit to keep the Amendments from the voters. *See Roberts v. Brown*, 43 So. 3d 673 (Fla. 2010). That suit was dismissed. The Legislature even went so far as to propose its own ballot initiative for the 2010 ballot, Amendment 7, which would have had the effect of nullifying the FairDistricts Amendments. But because the language of the ballot summary did not state the true purpose and effect of Amendment 7 and was misleading, the Florida Supreme Court removed the

[1]*See* Florida Department of State, Division of Elections, November 2, 2010 Election Results, https://doe.dos.state.fl.us/elections/resultsarchive/Index.asp?ElectionDate= 11/2/2010&DATAMODE= , last visitedFebruary 5, 2012.

Amendment from the ballot. *See Fla. Dept. of State v. Fla. State Conf. of NAACP Branches*, 43 So.3d 662, 664 (Fla. 2010).

26. After the Amendments passed, two incumbent members of Congress and the Florida House sought to have a federal court invalidate Amendment 6, now Article III, Section 20 of the Florida Constitution. *See Diaz-Balart v. Browning*, No. 1:10-cv-23968-UU (S.D. Fla. Sept. 9, 2011). That suit was dismissed on summary judgment. The Florida State House and the incumbent members of Congress then appealed to the Eleventh Circuit, where a three-judge panel unanimously rejected their argument and upheld Article III, Section 20. *See Brown v. Sec'y of State of Fla.*, No. 11-14554 (11th Cir. Jan. 31, 2012).

27. These challenges represent nothing other than desperate attempts by elected officials to retain power to which they have grown accustomed, and reflect politicians' preference for protecting their own political futures over the expressed wishes of their constituents.

b. *The Process of Drawing the Congressional Map*

28. Florida's redistricting process began with a series of public hearings held throughout the state from June through September 2011. According to the Legislature, these hearings were held to provide the public an opportunity to influence the Legislature's redistricting plans. But it was apparent from the beginning that these hearings were not designed to enable meaningful public participation. While the legislators heard statements from the public, at no time during the "public hearing process" did the Legislature provide any of its own maps for the public to openly discuss and debate. Instead, the public was given the task of submitting its own maps, commenting on those maps, and discussing general principles or redistricting preferences.

29. At the hearings, members of the League of Women Voters of Florida, Common Cause Florida, and the National Council of La Raza, (together, the "Coalition"), along with countless members of the public at large asked the Legislature to reveal its maps, or provide the maps that would likely form the

basis for those ultimately passed. Doing so, the groups argued, would have led to more productive hearings and would have permitted the public to analyze specific, concrete features of the Legislature's redistricting plan. Providing maps for the purpose of public consideration would have also ensured a degree of accountability for the Legislature. The Legislature, choosing to "hide the ball," refused to release its plans and instead set an artificial deadline of November 1, 2011 for members of the public to submit their own maps.

30. Indeed, only after the public hearings were all over and long after the deadline for public submissions had passed did the Legislature reveal its Congressional Plan.The Senate publicly revealed its proposed Congressional map on November 28, 2011 and formally introduced it in committee on December 6, 2011.On that same day, the House – in an apparent effort to keep the public guessing – released five separate Congressional maps. For the first time in the process, there were actual lines and proposed districts to discuss. But while the public was invited to travel to Tallahassee or to comment electronically, no further public hearings were held.

31. Although the Legislature claims that it considered the public's statements when drafting its redistricting plans, the extent to which it actually did remains questionable. The Legislature's proposed Congressional map does not reflect the totality of public opinion expressed at the hearings. Rather, legislators cherry-picked statements from the public hearings to support their preferred plan or to justify particular elements in the map before their chamber, and ignored the balance of public opinion. Thus, the public hearings offered merely a façade of legislative accountability.

32. On January 6, 2012 the Coalition filed an alternative Congressional redistricting proposal on the Legislature's internet website by the Coalition. This proposal, SPUBC0170, comported with the constitutional requirements in Article III, Section 20: it sought to maximize electoral possibilities for Florida's 27 Congressional seats by leveling the playing field and fostering competitiveness, was drawn without favoring incumbent officials, preserved minorities' ability to participate in the political process,

expanded the influence of minority voters, and respected the Amendment's mandates of contiguity, equal population, compactness, and respect for political and geographic boundaries.

33. The Coalition requested that both Houses consider its proposed plan as an alternative to those already under consideration. Both chambers rejected the Coalition's compliant plan.

34. On January 6, 2012, the Coalition wrote a letter to Senator Don Gaetz, Chairman of the Senate Reapportionment Committee, requesting that he or another member of the Committee offer the SPUBC0170 plan as a strike-all amendment and put it to a vote during a Committee meeting. The Senate Reapportionment Committee received the plan and had a full opportunity to consider it. Nonetheless, Senator Gaetz refused to offer the plan as a strike-all amendment and offer it for a vote. No member of the Committee defied him, and the alternative proposal was rejected out of hand.

35. On January 24, 2011, the Coalition wrote a letter to Representative William Weatherford, Chairman of the House Committee on Redistricting, requesting that he or another member of the Committee offer the SPUBC0170 plan as a strike-all amendment and put it to a vote during a Committee meeting. In response to Chairman Weatherford's request that the Coalition explain the merits of its proposed alternative plan, the Coalition prepared a written submission detailing how on Article III, Section 20 requirements, its SPUBC0170 plan was superior to the plan that the House Committee was then considering, H000C9047. Moreover, the Coalition informed the Committee of various ways in which H000C9047 violated the requirements of Article III, Section 20.

36. At its January 27, 2012 meeting, the House Committee on Redistricting considered the Coalition's plan along with its written submission. Chairman Weatherford offered the alternative plan as a strike-all amendment, which the Committee rejected. Ultimately, the House Committee passed its own proposal, H000C9047, despite having been informed by the Coalition of some of the plan's constitutional deficiencies.

37. On February 9, 2012 the Florida Legislature passed the 2012 Congressional Plan.

38. If allowed to stand, the Legislature's Congressional Plan will be used to define the districts for Florida's primary and general congressional elections in 2012 and for the rest of the decade, thus permanently and irreparably denying Plaintiffs' rights guaranteed by Article III, Section 20 of the Florida Constitution.

c. *The Proposed Congressional Map*

39. The Legislature's Congressional Plan unjustifiably violates the mandates of Florida's Constitution in numerous respects.

i. Partisan and Incumbent Favoritism

40. Article III, Section 20 requires that "[n]o apportionment plan or individual district shall be drawn with the intent to favor or disfavor a political party or an incumbent." The purpose of this constitutional provision was twofold: to stop the rampant self-interest that dominated Florida's redistricting process and led to a partisan imbalance in the State's Congressional delegation, and to prevent legislators from using the redistricting power as a way to ensure that incumbents are reelected.

41. The Legislature's Congressional Plan is filled with unconstitutional political gerrymanders intended to favor one political party and certain incumbents, while disfavoring the other political party and other incumbents. The State's intentional and purposeful use of the redistricting process to preserve one-party control and secure various incumbents' reelection undermines the voters' will and violates the Florida Constitution.

42. Although Florida's voters have split virtually evenly between Democratic and Republican candidates in recent statewide elections, the Legislature's Congressional Plan provides one party – the Republican party – with fully double the number of "safe" seats (i.e., seats that statistics show the party is almost certain to win) as it does the other party – the Democratic party.

43. The Legislature's intentional 2:1 Republican favoritism ratio with respect to the safe Congressional districts is made all the more egregious by the intentional favoritism evident in the design of the "competitive" districts. Those competitive districts favor the Republican Party by a ratio of **5:1**over the Democratic Party. Members of the Legislature were well aware of this intentional partisan favoritism and nevertheless voted to pass the Legislature's Congressional Plan.

44. Furthermore, Republican performance in the districts of some Republican incumbents, including but not limited to Mario Diaz-Balart (District 25) and Daniel Webster (District 10), was intentionally enhanced in the map passed by the Legislature. Upon information and belief, Webster and Diaz-Balart took affirmative steps to influence members of the Legislature and its staff to "improve" the composition of their new districts to make them more favorable. Members of the Legislature were well aware of these and other types of intentional incumbent favoritism and nevertheless voted to pass the Legislature's Congressional Plan.

45. By contrast, the redistricting plan submitted by the Coalition plainly did not favor a particular party or any particular incumbents. To the contrary, by faithfully adhering to the criteria of Article III, Section 20, the Coalition Plan naturally resulted in a competitive plan in which either party could win a majority of the seats in the Congressional delegation, and that had the effect of leveling the political playing field by maximizing electoral opportunities for all candidates.

46. Both the Senate Reapportionment Committee and House Redistricting Committee were aware of the Coalition Plan and the Coalition's criticism of the intentional partisan and incumbent favoritism that characterized the committee's proposals. Both committees affirmatively considered the Coalition Plan. Not surprisingly, both rejected it and adopted the

House Redistricting Committee's patently unlawful plan into law. This rejection of a politically fair plan demonstrates an intent to favor the controlling political party and its incumbents.

47. The State's violations of Article III, Section 20's prohibition against intentional political and incumbent gerrymandering are neither necessary nor justified.

ii. Failure to Protect Racial and Language Minorities

48. The Legislature's Congressional Plan also violates Article III, Section 20's requirement that a redistricting plan not be drawn "with the intent or result of denying or abridging the equal opportunity of racial or language minorities to participate in the political process or to diminish their ability to elect representatives of their choice." The purpose of this provision was to ensure that racial and language minority groups are given the power to participate meaningfully in Florida's statewide political process and to guarantee that a Congressional redistricting map does not diminish their ability to elect representatives of their choice.

49. The Legislature's Congressional Plan suppresses the ability of minorities to participate in Florida's political process by unnecessarily confining their influence to select districts and purposefully keeping them out of others.

50. By packing artificially high numbers of minorities into certain districts, the Legislature necessarily has removed them from surrounding districts, thereby diminishing their influence in surrounding districts. Thus, under the Legislature's Congressional Plan, districts have been drawn with the intent, and result, of abridging the right of minority voters to participate in Florida's political process, in violation of Article III, Section 20.

51. As just one example, the 49% of the voters in the State's proposed District 5 are African-American. However, African-American voters in this district would be able to elect a candidate of their choice if the district were drawn with a substantially smaller plurality of the electorate. By unpacking

the district, the African-American voters currently packed into District 5 would be able to gain influence and affect elections in additional surrounding districts.

52. By packing minority voters into select districts unnecessarily, however, the Legislature diminished their ability to participate in the political process and subverted other state constitutional requirements of compactness and respect for political and geographic subdivisions.

iii. Compactness

53. Article III, Section 20(b) requires that "districts shall be compact." This provision was intended to prevent grotesquely misshapen districts that wind throughout different regions of the state to cherry-pick particular enclaves of voters, in order to choose voters of particular political persuasions.

54. The Legislature's Congressional Plan contains numerous non-compact districts in violation of the Florida Constitution.

55. District 5, for example, is the very definition of non-compactness. On its face, this district is defined by twisted and incoherent boundaries. It begins north of Jacksonville, where it twists and turns before heading south on Highway 17, then swerves west to pick up additional voters in the area surrounding Gainesville. It then continues southeast to Orlando, ultimately breaking into two distinct, contorted appendages. Weaving from one metropolitan area to another and crossing unpopulated territory to do so, District 5 unites distinct communities into one misshapen district over 150 miles long. It cuts through no fewer than eight counties: Alachua, Clay, Duval, Lake, Marion, Orange, Putnam, and Seminole. And it cuts through city boundaries in order to collect only *selected* parts those cities, including: Gainesville, Jacksonville, Orlando, Orange Park, Apopka, and Sanford.

56. Drawing this grotesquely misshapen district was in no way necessary in order to comply with the other criteria of Article III, Section 20. For example, a less contorted district of the kind suggested to the legislature in the Coalition plan would still provide African-Americans an opportunity to elect a representative of their choice. *See supra* ¶¶ 49-52.

57. District 20 in the Legislature's Congressional Plan is another example of the Legislature's disregard for the constitutional requirement of compactness. Indeed, its cragged appendages strain even to be contiguous. At one point, the northernmost appendage is barely wide enough to cover half of a highway and an elementary school.

58. Drawing District 20 this way was in no way necessary in order to comply with the other criteria of Article III, Section 20.

59. Other districts, including but not limited to District 13, are far less compact, without any justification, than the corresponding districts in the Coalition Plan rejected by the Legislature.

60. Taken as a whole, the Legislature's Congressional Plan is less compact, without justification, than other fully compliant plans that the Legislature rejected, including the Coalition Plan.

iv. Respect for Political and Geographical Boundaries

61. Article III, Section 20(b) of the Florida Constitution requires that districts utilize existing political boundaries where feasible. The Legislature's Congressional Plan as a whole fails to respect political and geographic boundaries.

62. District 14, for example, unnecessarily divides counties and crosses Tampa Bay. The corresponding district in the Coalition Plan is neatly contained in one county on one side of the bay.

63. District 5, for example, crosses eight county lines, and pulls in select portions of no fewer than six different cities.

64. Statewide, the Legislature's Congressional Plan keeps fewer cities and voting districts whole and violates more county and municipal boundaries than did the Coalition Plan and other plans in the record. The members of the Senate Reapportionment Committee and House Committee on Redistricting thus knew it was feasible to do better, and deliberately chose not to. In doing so, they violated the clear command of Article III, Section 20.

65. These violations of the Article III, Section 20 requirement of respect for political and geographic boundaries are neither necessary nor justified.

COUNT I

66. Plaintiffs reallege the facts set forth in paragraphs 1 through 65, above.

67. The Legislature's Congressional Plan was drawn with the intent to favor the controlling political party and to disfavor the minority political party in violation of the Florida Constitution, Article III, Section 20(a).

COUNT II

68. Plaintiffs reallege the facts set forth in paragraphs 1 through 65, above.

69. The Legislature's Congressional Plan was drawn with the intent to favor certain incumbents and disfavor others in violation of the Florida Constitution, Article III, Section 20(a).

COUNT III

70. Plaintiffs reallege the facts set forth in paragraphs 1 through 65, above.

71. The Legislature's Congressional Plan was drawn with the intent to diminish and/or the effect of diminishing the ability of racial and language minorities to participate in the political process and to elect candidates of their choice in violation of the Florida Constitution, Article III, Section 20(a).

COUNT IV

72. Plaintiffs reallege the facts set forth in paragraphs 1 through 65, above.

73. The Legislature's Congressional Plan fails to draw districts that are compact in violation of the Florida Constitution, Article III, Section 20(b).

COUNT V

74. Plaintiffs reallege the facts set forth in paragraphs 1 through 65, above.

75. The Legislature's Congressional Plan fails to utilize existing political and geographic boundaries where feasible in violation of the Florida Constitution, Article III, Section 20(b).

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray that this Court:

1. Assume jurisdiction of this action.

2. Issue a declaratory judgment, pursuant to Fla. Stat. § 86.011 (2011) as well as Fla. Stat. § 26.012(3) (2011) declaring that the Legislature's Congressional Plan constitutes a violation of Article III, Section 20 of the Florida Constitution.

3. Issue preliminary and permanent injunctions enjoining the Defendants, their agents, employees, and those persons acting in concert with them, from enforcing or giving any effect to the proposed Congressional district boundaries as drawn in the Legislature's Congressional Plan, including enjoining Defendants from conducting any elections for the United States House of Representatives based on the Legislature's Congressional Plan.

4. Enter an order adopting a lawful Congressional redistricting plan for the State of Florida or direct the Florida Senate and the Florida House to adopt a lawful Congressional districting plan for the State of Florida.

5. Make all further orders as are just, necessary, and proper to ensure complete fulfillment of this Court's declaratory and injunctive orders in this case.

6. Issue an order requiring Defendants to pay Plaintiffs' costs and expenses incurred in the prosecution of this action, as authorized by Fla. Stat. § 86.081 (2011).

7. Grant such other and further relief as it seems is proper and just.

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