

No. 17-14194

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

CAROL WILDING, *et al.*,

Appellants/Plaintiffs,

vs.

DNC SERVICES CORPORATION, *et al.*,

Appellees/Defendants.

Appeal from the United States District Court
for the Southern District of Florida

APPELLANTS/PLAINTIFFS' APPENDIX VOLUME I

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**CERTIFICATE OF INTERESTED PERSONS AND CORPORATE
DISCLOSURE STATEMENT**

To the best of undersigned's knowledge, the following is a complete list of the trial judges, attorneys, persons, associations of persons, firms, partnerships, or corporations that have or may have an interest in the outcome of this case, including subsidiaries, conglomerates, affiliates, and parent corporations, including any publicly held company that owns 10% or more of the party's stock, and other identifiable legal entities related to a party.

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2. Connie Anderson, Plaintiff/Appellant.
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5. Lester John Bates, Plaintiff/Appellant.
6. Beck & Lee P.A., trial and appellate counsel for Plaintiffs/Appellants.
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8. Jared H. Beck, trial and appellate counsel for Plaintiffs/Appellants.
9. Mark Bedard, Plaintiff/Appellant.
10. Nancy Berners-Lee, Plaintiff/Appellant.

11. Jen Betterley, Plaintiff/Appellant.
12. Harris Bierhoff, Plaintiff/Appellant.
13. Timothy Bingen, Plaintiff/Appellant.
14. Stephanie Birdsong, Plaintiff/Appellant.
15. Marianne Blair, Plaintiff/Appellant.
16. Richard Booker, Plaintiff/Appellant.
17. Barbara Bowen, Plaintiff/Appellant.
18. Richard Boylan, Plaintiff/Appellant.
19. Matthew Joseph Brady, Plaintiff/Appellant.
20. Kyle Braund, Plaintiff/Appellant.
21. Chris Bubb, Plaintiff/Appellant.
22. Tristan Burgener, Plaintiff/Appellant.
23. D.J. Buschini, Plaintiff/Appellant.
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25. Joseph Callan, Plaintiff/Appellant.
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28. Susan Catterall, Plaintiff/Appellant.
29. Vincent Cauchi, Plaintiff/Appellant.
30. Cynthia Chan, Plaintiff/Appellant.

31. Torsha Childs, Plaintiff/Appellant.
32. Karlie Cole, Plaintiff/Appellant.
33. Aimee Coleman, Plaintiff/Appellant.
34. Rosalie Consiglio, Plaintiff/Appellant.
35. Daniel Cooper, Plaintiff/Appellant.
36. Yalonda Dye Cooper, Plaintiff/Appellant.
37. Suzanne Cork, Plaintiff/Appellant.
38. Rhiannon Crandall, Plaintiff/Appellant.
39. William Crandall, Plaintiff/Appellant.
40. Sharon Crawford, Plaintiff/Appellant.
41. Phyllis Criddle, Plaintiff/Appellant.
42. John Crowe, Plaintiff/Appellant.
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45. Catherine Cyko, Plaintiff/Appellant.
46. Heather Dade, Plaintiff/Appellant.
47. Alecia Davis, Plaintiff/Appellant.
48. Sherry Davis, Plaintiff/Appellant.
49. Tammy Deitch-Coulter, Plaintiff/Appellant.

50. DNC Services Corporation, Defendant/Appellee.
51. Kathleen Dodge, Plaintiff/Appellant.
52. Diane Emily Dreyfus, Plaintiff/Appellant.
53. Dan Ellis Dudley, Plaintiff/Appellant.
54. Amalie Duvall, Plaintiff/Appellant.
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57. Erik Michael Ferragut, Plaintiff/Appellant.
58. Elizabeth Figueroa, Plaintiff/Appellant.
59. Diana Flores, Plaintiff/Appellant.
60. William Scott Franz, Plaintiff/Appellant.
61. Susan Frisbie, Plaintiff/Appellant.
62. Elisabeth C. Frost, counsel for Defendants/Appellees.
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65. Laura Genna, Plaintiff/Appellant.
66. Ryan Ghan, Plaintiff/Appellant.
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68. Jeffrey Goldberg, Plaintiff/Appellant.
69. Estrella Gonzalez, Plaintiff/Appellant.

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74. Anthony Grudin, Plaintiff/Appellant.
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76. Julie Hampton, Plaintiff/Appellant.
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82. Rebecca Hohm, Plaintiff/Appellant.
83. Kim Marie Houle, Plaintiff/Appellant.
84. Stephen Houseknecht, Plaintiff/Appellant.
85. Lewis Humiston, Plaintiff/Appellant.
86. United States Magistrate Judge Patrick M. Hunt.
87. Kirsten Hurst, Plaintiff/Appellant.
88. Benjamin Ilarraza, Plaintiff/Appellant.

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90. Danielle Ingrassia, Plaintiff/Appellant.
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94. Tamara Johnston, Plaintiff/Appellant.
95. Heather Jordan, Plaintiff/Appellant.
96. Rana Kangas-Kent, Plaintiff/Appellant.
97. Brandy Kincaid, Plaintiff/Appellant.
98. Amber Rae Knowlton, Plaintiff/Appellant.
99. Theda Larson-Wright, Plaintiff/Appellant.
100. Peggy Lew, Plaintiff/Appellant.
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107. Christine Maiurano, Plaintiff/Appellant.
108. Melissa Marcotte, Plaintiff/Appellant.

109. Raymond Maxwell, Plaintiff/Appellant.
110. Lisa Anne Meneely, Plaintiff/Appellant.
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112. Greta Mickey, Plaintiff/Appellant.
113. Carl Miller, Plaintiff/Appellant.
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115. Angela Monson, Plaintiff/Appellant.
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119. Andrew Orrino, Plaintiff/Appellant.
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125. Kenneth Puckett, Plaintiff/Appellant.
126. David Pulaski, Plaintiff/Appellant.
127. David Pyles, Plaintiff/Appellant.
128. Valerie Elyse Rasch, Plaintiff/Appellant.

129. Michael Reed, Plaintiff/Appellant.
130. Susan Reed, Plaintiff/Appellant.
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132. Stanley Rifken, Plaintiff/Appellant.
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134. Rachel Roderick, Plaintiff/Appellant.
135. Jeff Rogers, Plaintiff/Appellant.
136. Dominic Ronzani, Plaintiff/Appellant.
137. Susan Lynne Roppel, Plaintiff/Appellant.
138. Andrew Rousseau, Plaintiff/Appellant.
139. Deborah Wasserman Schultz, Defendant/Appellee.
140. Lisa Settle, Plaintiff/Appellant.
141. Julianna Seymour, Plaintiff/Appellant.
142. Matthew Shaw, Plaintiff/Appellant.
143. Zeke Shaw, Plaintiff/Appellant.
144. James Simon, Plaintiff/Appellant.
145. Susan Singer, Plaintiff/Appellant.
146. Erika Sitzer, Plaintiff/Appellant.
147. Brenda Lee Smith, Plaintiff/Appellant.
148. Elesha Snyder, Plaintiff/Appellant.

149. Erich Sparks, Plaintiff/Appellant.
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152. Alaina Talboy, Plaintiff/Appellant.
153. Felicia Michelle Taylor, Plaintiff/Appellant.
154. Brett Teegardin, Plaintiff/Appellant.
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164. Rebecca White-Hayes, Plaintiff/Appellant.
165. Carol Wilding, Plaintiff/Appellant.
166. Catherine Willott, Plaintiff/Appellant.
167. AnnMarie Wilson, Plaintiff/Appellant.
168. Graham Wilson, counsel for Defendants/Appellees.

169. Gregory Witkowski, Plaintiff/Appellant.
170. Emma Young, Plaintiff/Appellant.
171. United States District Court Senior Judge William J. Zloch.

DS	N/A	Docket Sheet	I
1	06/28/2016	Complaint	I
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8	07/13/2016	First Amended Complaint	I
8-1	07/13/2016	Exhibit 1	I
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10	07/22/2016	Declaration of Rebecca Herries in Support of Defendants' Motion to Dismiss for Insufficient Service of Process or, in the Alternative, Extend Time to Answer or Respond to Complaint	II
11	07/22/2016	Memorandum of Law in Support of Defendants' Motion to Dismiss for Insufficient Service of Process or, in the Alternative, Extend Time to Answer or Respond to Complaint	II
24	08/05/2016	Plaintiffs' Response in Opposition to the Defendants' Motion to Dismiss and Alternative Motion to Extend Time	II
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40	08/29/2016	Order Granting Motion to Quash Service of Process	II
44	09/21/2016	Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint and Memorandum of Law in Support	II
45	09/21/2016	Declaration of Patrice Taylor in Support of Defendants' Motion to Dismiss First Amended Complaint	II
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46-2	09/21/2016	Exhibit 2	II
46-3	09/21/2016	Exhibit 3	II
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47	09/21/2016	Defendants' Notice of Filing Proposed Order Granting Motion to Dismiss	II
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50	04/10/2017	Order Setting Hearing on Motion to Dismiss Amended Complaint	II
54	04/28/2017	Transcript of Motion Hearing Held 04/25/17	III
55	06/01/2017	Notice of Filing E-mail	III
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57-3	06/13/2017	Exhibit 3	III
57-4	06/13/2017	Exhibit 4	III
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58	06/14/2017	Defendants' Response to Plaintiffs' Motion for Order of Protection and Request for Hearing	III
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68	10/13/2017	Transcript of Hearing Held on 8/23/16	IV
70	01/17/2018	Notice of Filing January 10, 2018 Order from the U.S. 11 th Circuit Court of Appeals and of Plaintiffs' Second Amended Complaint	IV
70-1	01/17/2018	Exhibit A	IV
70-2	01/17/2018	Exhibit B	IV

DATED: January 26, 2018

Respectfully submitted,

/s/ Jared H. Beck

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TAB/DOCKET NO.
DS

U.S. District Court
Southern District of Florida (Ft Lauderdale)
CIVIL DOCKET FOR CASE #: 0:16-cv-61511-WJZ

WILDING et al v. DNC SERVICES
CORPORATION et al
Assigned to: Judge William J. Zloch
Case in other court: USCA, 17-14194-A
Cause: 28:1332 Diversity-Fraud

Date Filed: 06/28/2016
Date Terminated: 08/25/2017
Jury Demand: Plaintiff
Nature of Suit: 370 Other Fraud
Jurisdiction: Diversity

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Plaintiff

DANIELLE INGRASSIA

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Plaintiff

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Plaintiff

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V.

Defendant

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Defendant

**DEBORAH WASSERMAN
SCHULTZ**

represented by **Gregg Darrow Thomas**
(See above for address)
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Mark Richard Caramanica

(See above for address)
ATTORNEY TO BE NOTICED

Intervenor

Steve Schonberg
TERMINATED: 07/26/2016

represented by **Steve Schonberg**
7938 SE 12th Circle
Ocala, FL 34480
PRO SE

Date Filed	#	Docket Text
06/28/2016	<u>1</u>	COMPLAINT <i>CLASS ACTION</i> against All Defendants. Filing fees \$ 400.00 receipt number 113C-8870211, filed by FELICIA MICHELLE TAYLOR, SUSAN L SINGER, KENNETH E

BRADY, LUCILLE GROOMS, TRISTAN BURGNER,
KIRSTEN HOFFMAN, JOSE ALBERTO GONZALEZ, DANIEL
J REYNOLDS, KARLIE COLE, SHARON JANIS, SUSAN
FRISBIE, CATHERINE G CYKO, CHRISTINE MAIURANO,
ZACHARY JAMES HANEY, RACHEL RODERICK, HEATHER
DADE, BRENDA LEE SMITH, JOHN LYNCH, CAROLYN
JACOBSON, TIMO A JOHANN, RHIANNON CRANDALL,
YALONDA DYE COOPER, SHERRY DAVIS, DIANE EMILY
DREYFUS, MARIANNE BLAIR, CYNTHIA T CHAN, NANCY
BERNERS-LEE, ANTHONY GRUDIN, DAVID L MEULI,
TIMOTHY BINGEN, HARRIS BIERHOFF, JOSEPH GLEASON,
LAUREN HALE, SUSAN REED, DAVID N PYLES, RICK
WASHIK, SEAN LYNCH, TAMMY DEITCH-COULTER, D.J.
BUSCHINI, JEFFREY GOLDBERG, STEFANIE BIRDSONG,
EMMA L YOUNG, PATRICIA D CASSIDY, SUSAN
CATTERALL, ALECIA R DAVIS, CONNIE ANDERSON,
ANDREW ROUSSEAU, HEATHER JORDAN, GRETA MICKEY,
ANGELA MONSON, ELIZABETH FIGUEROA, KATHRYN
BAILEY CONANT, MATTHEW SHAW, ERICH SPARKS, LUKE
GRIM, LISA SETTLE, MICHAEL S REED, LAURA MICHELLE
VAUGHN, THEDA LARSON-WRIGHT, LEWIS L HUMISTON,
IV, JULIE HAMPTON, LISA ANNE MENEELY, LAURA
GENNA, LESTER JOHN BATES, III, DANIEL S COOPER,
EDWIN LUGO, CHRIS BUBB, BENJAMIN ILARRAZA, ERIK
FURREBOE, STANLEY RIFKEN, ESTRELLA GONZALEZ,
CAROL WILDING, RAYMOND D MAXWELL, KATHLEEN L
DODGE, BRITTANY R MUSICK, BAKH INAMOV, PHYLLIS
CRIDDLE, PRABU GOPALAKRISHNAN, PEGGY LEW,
MARLOWE ST. CLOUD PRIMACK, ERIK MICHAEL
FERRAGUT, GREGORY WITKOWSKI, CARLOS VILLAMAR,
JAMES SIMON, ELESHA SNYDER, ZEKE SHAW, MELISSA
LIANG, RYAN GHAN, KAYITE ASHCRAFT, DANIEL
O'MEARA, BRUCE BUSTO, ROSALIE CONSIGLIO, RICHARD
BOOKER, VALERIE ELYSE RESCH, BRANDY KINCAID,
TWANA SPARKS, BRETT TEEGARDIN, AIMEE R COLEMAN,
JEFF ROGERS, SUZANNE M CORK, MARY JASMINE
WELCH, DAN ELLIS DUDLEY, SHARON CRAWFORD,
WILLIAM CRANDALL, AMBER RAE KNOWLTON, DOMINIC
RONZANI, AUSTIN DREIS-ORNELAS, KIM MARIE HOULE,
LISA GALE, DUFFY ROBERT WEISS, JANE ELLEN
PLATTNER, RANA KANGAS-KENT, WILLIAM SCOTT
FRANZ, KYLE G BRAUND, KIRSTEN HURST, CATHERINE

		Case 1:16-cv-01101-ALB Document 1-1 Filed 06/28/16 Page 1 of 25 WILLOTT, KIMBERLY ALBERTS, DAVID PULASKI. (Attachments: # 1 Exhibit 1, # 2 Civil Cover Sheet, # 3 Summon(s) DNC, # 4 Summon(s) Schultz)(Beck, Jared) (Entered: 06/28/2016)
06/28/2016	2	Judge Assignment to Judge William J. Zloch (srd) (Entered: 06/29/2016)
06/28/2016	3	Clerks Notice pursuant to 28 USC 636(c). Parties are hereby notified that the U.S. Magistrate Judge Patrick M. Hunt is available to handle any or all proceedings in this case. If agreed, parties should complete and file the attached form. (srd) (Entered: 06/29/2016)
06/30/2016	4	Summons Issued as to DNC SERVICES CORPORATION. (srd) (Entered: 06/30/2016)
06/30/2016	5	Summons Issued as to DEBORAH WASSERMAN SCHULTZ. (srd) (Entered: 06/30/2016)
07/06/2016	6	SUMMONS (Affidavit) Returned Executed on 1 Complaint,,,,,,,,, with a 21 day response/answer filing deadline by FELICIA MICHELLE TAYLOR, SUSAN L SINGER, KENNETH E PUCKETT, TAMARA L JOHNSTON, MATTHEW JOSEPH BRADY, LUCILLE GROOMS, TRISTAN BURGNER, KIRSTEN HOFFMAN, JOSE ALBERTO GONZALEZ, DANIEL J REYNOLDS, KARLIE COLE, SHARON JANIS, SUSAN FRISBIE, CATHERINE G CYKO, CHRISTINE MAIURANO, ZACHARY JAMES HANEY, RACHEL RODERICK, HEATHER DADE, BRENDA LEE SMITH, JOHN LYNCH, CAROLYN JACOBSON, TIMO A JOHANN, RHIANNON CRANDALL, YALONDA DYE COOPER, SHERRY DAVIS, DIANE EMILY DREYFUS, MARIANNE BLAIR, CYNTHIA T CHAN, NANCY BERNERS-LEE, ANTHONY GRUDIN, DAVID L MEULI, TIMOTHY BINGEN, HARRIS BIERHOFF, JOSEPH GLEASON, LAUREN HALE, SUSAN REED, DAVID N PYLES, RICK WASHIK, SEAN LYNCH, TAMMY DEITCH-COULTER, D.J. BUSCHINI, JEFFREY GOLDBERG, STEFANIE BIRDSONG, PATRICIA D CASSIDY, SUSAN CATTERALL, ALECIA R DAVIS, CONNIE ANDERSON, ANDREW ROUSSEAU, HEATHER JORDAN, GRETA MICKEY, ANGELA MONSON, ELIZABETH FIGUEROA, KATHRYN BAILEY CONANT, MATTHEW SHAW, ERICH SPARKS, LUKE GRIM, LISA SETTLE, MICHAEL S REED, LAURA MICHELLE VAUGHN, THEDA LARSON-WRIGHT, LEWIS L HUMISTON, IV, JULIE HAMPTON, LISA ANNE MENEELY, LAURA GENNA,

Case: [ESTER JOHN BATES, JR, DANIEL COOPER](#), EDWIN LUGO, CHRIS BUBB, BENJAMIN ILARRAZA, ERIK FURREBOE, STANLEY RIFKEN, ESTRELLA GONZALEZ, CAROL WILDING, RAYMOND D MAXWELL, KATHLEEN L DODGE, BRITTANY R MUSICK, BAKH INAMOV, PHYLLIS CRIDDLE, PRABU GOPALAKRISHNAN, PEGGY LEW, MARLOWE ST. CLOUD PRIMACK, ERIK MICHAEL FERRAGUT, CARLOS VILLAMAR, JAMES SIMON, ELESNA SNYDER, ZEKE SHAW, MELISSA LIANG, RYAN GHAN, KAYITE ASHCRAFT, DANIEL O'MEARA, BRUCE BUSTO, ROSALIE CONSIGLIO, RICHARD BOOKER, VALERIE ELYSE RESCH, BRANDY KINCAID, TWANA SPARKS, BRETT TEEGARDIN, AIMEE R COLEMAN, JEFF ROGERS, SUZANNE M CORK, MARY JASMINE WELCH, DAN ELLIS DUDLEY, SHARON CRAWFORD, WILLIAM CRANDALL, AMBER RAE KNOWLTON, DOMINIC RONZANI, AUSTIN DREIS-ORNELAS, KIM MARIE HOULE, LISA GALE, DUFFY ROBERT WEISS, JANE ELLEN PLATTNER, RANA KANGAS-KENT, WILLIAM SCOTT FRANZ, KYLE G BRAUND, KIRSTEN HURST, CATHERINE WILLOTT, KIMBERLY ALBERTS, DAVID PULASKI. DNC SERVICES CORPORATION served on 7/1/2016, answer due 7/22/2016. (Beck, Jared) (Entered: 07/06/2016)

07/06/2016

[7](#) SUMMONS (Affidavit) Returned Executed on [1](#) Complaint,,,,,,,,,,,, with a 21 day response/answer filing deadline by FELICIA MICHELLE TAYLOR, SUSAN L SINGER, KENNETH E PUCKETT, TAMARA L JOHNSTON, MATTHEW JOSEPH BRADY, LUCILLE GROOMS, TRISTAN BURGNER, KIRSTEN HOFFMAN, JOSE ALBERTO GONZALEZ, DANIEL J REYNOLDS, KARLIE COLE, SHARON JANIS, SUSAN FRISBIE, CATHERINE G CYKO, CHRISTINE MAIURANO, ZACHARY JAMES HANEY, RACHEL RODERICK, HEATHER DADE, BRENDA LEE SMITH, JOHN LYNCH, CAROLYN JACOBSON, TIMO A JOHANN, RHIANNON CRANDALL, YALONDA DYE COOPER, SHERRY DAVIS, DIANE EMILY DREYFUS, MARIANNE BLAIR, CYNTHIA T CHAN, NANCY BERNERS-LEE, ANTHONY GRUDIN, DAVID L MEULI, TIMOTHY BINGEN, HARRIS BIERHOFF, JOSEPH GLEASON, LAUREN HALE, SUSAN REED, DAVID N PYLES, RICK WASHIK, SEAN LYNCH, TAMMY DEITCH-COULTER, D.J. BUSCHINI, JEFFREY GOLDBERG, STEFANIE BIRDSONG, PATRICIA D CASSIDY, SUSAN CATTERALL, ALECIA R

Case 1:16-cv-01194-DWM Document 18-1 Filed 07/06/16 Page 9 of 25

DAVIS, CONNIE F ANDERSON, ANDREW ROUSSEAU, HEATHER JORDAN, GRETA MICKEY, ANGELA MONSON, ELIZABETH FIGUEROA, KATHRYN BAILEY CONANT, MATTHEW SHAW, ERICH SPARKS, LUKE GRIM, LISA SETTLE, MICHAEL S REED, LAURA MICHELLE VAUGHN, THEDA LARSON-WRIGHT, LEWIS L HUMISTON, IV, JULIE HAMPTON, LISA ANNE MENEELY, LAURA GENNA, LESTER JOHN BATES, III, DANIEL S COOPER, EDWIN LUGO, CHRIS BUBB, BENJAMIN ILARRAZA, ERIK FURREBOE, STANLEY RIFKEN, ESTRELLA GONZALEZ, RAYMOND D MAXWELL, KATHLEEN L DODGE, BRITTANY R MUSICK, BAKH INAMOV, PHYLLIS CRIDDLE, PRABU GOPALAKRISHNAN, PEGGY LEW, MARLOWE ST. CLOUD PRIMACK, ERIK MICHAEL FERRAGUT, CARLOS VILLAMAR, JAMES SIMON, ELESHA SNYDER, ZEKE SHAW, MELISSA LIANG, RYAN GHAN, KAYITE ASHCRAFT, DANIEL O'MEARA, BRUCE BUSTO, ROSALIE CONSIGLIO, RICHARD BOOKER, VALERIE ELYSE RESCH, BRANDY KINCAID, TWANA SPARKS, BRETT TEEGARDIN, AIMEE R COLEMAN, JEFF ROGERS, SUZANNE M CORK, MARY JASMINE WELCH, DAN ELLIS DUDLEY, SHARON CRAWFORD, WILLIAM CRANDALL, AMBER RAE KNOWLTON, DOMINIC RONZANI, AUSTIN DREIS-ORNELAS, KIM MARIE HOULE, LISA GALE, DUFFY ROBERT WEISS, JANE ELLEN PLATTNER, RANA KANGAS-KENT, WILLIAM SCOTT FRANZ, KYLE G BRAUND, KIRSTEN HURST, KIMBERLY ALBERTS, DAVID PULASKI. DEBORAH WASSERMAN SCHULTZ served on 7/1/2016, answer due 7/22/2016. (Beck, Jared) (Entered: 07/06/2016)

07/13/2016

[8](#) First AMENDED COMPLAINT *CLASS ACTION* against All Defendants, filed by FELICIA MICHELLE TAYLOR, KENNETH E PUCKETT, LUCILLE GROOMS, TRISTAN BURGNER, KIRSTEN HOFFMAN, CATHERINE G CYKO, ZACHARY JAMES HANEY, RACHEL RODERICK, HEATHER DADE, BRENDA LEE SMITH, CAROLYN JACOBSON, TIMO A JOHANN, RHIANNON CRANDALL, MARIANNE BLAIR, NANCY BERNERS-LEE, DAVID L MEULI, HARRIS BIERHOFF, LAUREN HALE, SUSAN REED, RICK WASHIK, STEFANIE BIRDSONG, EMMA L YOUNG, PATRICIA D CASSIDY, SUSAN CATTERALL, GRETA MICKEY, MATTHEW SHAW, ERICH SPARKS, LISA SETTLE, THEDA LARSON-WRIGHT, LEWIS L HUMISTON, IV, LISA ANNE MENEELY,

Case: 1:17-cv-00001-DWM Document: 1-1 Filed: 01/17/18 Page: 90 of 116
ESTER JOHNSON, DANIEL SUTHERLAND, DANIEL COOPER, CHRIS BUBB, STANLEY RIFKEN, ESTRELLA GONZALEZ, PHYLLIS CRIDDLE, PRABU GOPALAKRISHNAN, ELESHA SNYDER, ZEKE SHAW, MELISSA LIANG, KAYITE ASHCRAFT, DANIEL O'MEARA, BRUCE BUSTO, RICHARD BOOKER, BRETT TEEGARDIN, JEFF ROGERS, LISA GALE, JANE ELLEN PLATTNER, RANA KANGAS-KENT, KIRSTEN HURST, CATHERINE WILLOTT, KIMBERLY ALBERTS, DAVID PULASKI, SUSAN L SINGER, MATTHEW JOSEPH BRADY, TAMARA L JOHNSTON, JOSE ALBERTO GONZALEZ, KARLIE COLE, DANIEL J REYNOLDS, SUSAN FRISBIE, CHRISTINE MAIURANO, JOHN LYNCH, YALONDA DYE COOPER, SHERRY DAVIS, DIANE EMILY DREYFUS, CYNTHIA T CHAN, ANTHONY GRUDIN, TIMOTHY BINGEN, JOSEPH GLEASON, DAVID N PYLES, TAMMY DEITCH-COULTER, SEAN LYNCH, D.J. BUSCHINI, JEFFREY GOLDBERG, ALECIA R DAVIS, CONNIE ANDERSON, ANDREW ROUSSEAU, HEATHER JORDAN, ELIZABETH FIGUEROA, ANGELA MONSON, LUKE GRIM, MICHAEL S REED, JULIE HAMPTON, LAURA MICHELLE VAUGHN, LAURA GENNA, EDWIN LUGO, BENJAMIN ILARRAZA, ERIK FURREBOE, CAROL WILDING, KATHLEEN L DODGE, RAYMOND D MAXWELL, BRITTANY R MUSICK, BAKH INAMOV, PEGGY LEW, ERIK MICHAEL FERRAGUT, MARLOWE ST. CLOUD PRIMACK, JAMES SIMON, CARLOS VILLAMAR, GREGORY WITKOWSKI, RYAN GHAN, ROSALIE CONSIGLIO, BRANDY KINCAID, VALERIE ELYSE RESCH, AIMEE R COLEMAN, SUZANNE M CORK, MARY JASMINE WELCH, DAN ELLIS DUDLEY, WILLIAM CRANDALL, SHARON CRAWFORD, AMBER RAE KNOWLTON, KIM MARIE HOULE, DOMINIC RONZANI, DUFFY ROBERT WEISS, WILLIAM SCOTT FRANZ, KYLE G BRAUND, CARL MILLER, JULIANNA SEYMOUR, TUKOI JARRETT, STEVE PHILIPP, AMALIE DUVALL, VINCENT J CAUCHI, STEPHEN HOUSEKNECHT, REBECCA HOHM, ANDREW ORRINO, JARATH HEMPHILL, RICHARD BOYLAN, SARAH LOPEZ, GEORGE THOMAS, JEN BETTERLEY, ELIZA FEERO, SUSAN ROPPEL, GAYLE ANN HARROD, ALETTE PRICHETT, BARBARA BOWEN, JOHN CROWE, MELISSA MARCOTTE, DIANE ROBINSON, JOSEPH CALLAN, DIANA FLORES, CRAIG RICHARD CURRIER, ANNMARIE WILSON, ERIKA SITZER, DANIELLE INGRASSIA, ALAINA TALBOY, REBECCA WHITE-HAYES,

		Case: 17-134 Date Filed: 07/13/2018 Page: 2 of 20 MARK BEDARD, SUSAN PHILLIPS, TERC MONACO, TORSHA CHILDS. (Attachments: # 1 Exhibit 1)(Beck, Jared) (Entered: 07/13/2016)
07/22/2016	9	MOTION to Quash Service of Process 1 Complaint by DNC SERVICES CORPORATION. Attorney Gregg Darrow Thomas added to party DNC SERVICES CORPORATION(pty:dft). Responses due by 8/8/2016 (Thomas, Gregg). Added MOTION for Extension of Time to File Response/Reply/Answer on 7/25/2016 (asl). -Modified/Construed as a Motion to Quash per 25 Order on 8/30/2016 (gp).- (Entered: 07/22/2016)
07/22/2016	10	SUPPLEMENT to 9 MOTION to Dismiss 1 Complaint,,,,,,,,, Declaration of Rebecca Herries by DNC SERVICES CORPORATION (Thomas, Gregg) (Entered: 07/22/2016)
07/22/2016	11	MEMORANDUM in Support re 9 MOTION to Dismiss 1 Complaint,,,,,,,,, by DNC SERVICES CORPORATION, Deborah Wasserman Schultz. (Thomas, Gregg) Modified to add missing filer on 7/25/2016 (asl). (Entered: 07/22/2016)
07/22/2016	12	NOTICE by DNC SERVICES CORPORATION re 9 MOTION to Dismiss 1 Complaint,,,,,,,,, (Attachments: # 1 Exhibit Proposed Order) (Thomas, Gregg) (Entered: 07/22/2016)
07/25/2016	13	Clerks Notice to Filer re 11 Memorandum. All Parties Filing Document Were Not Selected ; ERROR - All Parties filing the document were not selected. The correction was made by the Clerk. It is not necessary to refile this document. (asl) (Entered: 07/25/2016)
07/25/2016	14	Clerks Notice to Filer re 9 MOTION to Dismiss 1 Complaint,,,,,,,,, . Motion with Multiple Reliefs Filed as One Relief ; ERROR - The Filer selected only one relief event and failed to select the additional corresponding events for each relief requested in the motion. The docket entry was corrected by the Clerk. It is not necessary to refile this document but future filings must comply with the instructions in the CM/ECF Attorney User's Manual. (asl) (Entered: 07/25/2016)
07/25/2016	15	Expedited MOTION to Intervene by Steve Schonberg. (jas) (Entered: 07/25/2016)
07/25/2016	16	CERTIFICATE OF SERVICE by Steve Schonberg re 15 MOTION to Intervene. (jas) (Entered: 07/25/2016)
07/26/2016	17	ORDER denying 15 Motion to Intervene. Notice of Termination

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 delivered by US Mail to Steve Schomberg. Signed by Judge William J. Zloch on 7/26/2016. (bc) (Entered: 07/26/2016)

07/29/2016	18	AMENDED ORDER denying 15 Motion to Intervene. Signed by Judge William J. Zloch on 7/29/2016. (bc) (Entered: 07/29/2016)
08/02/2016	19	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Marc E. Elias. Filing Fee \$ 75.00 Receipt # 113C-8968404 by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. Attorney Gregg Darrow Thomas added to party DEBORAH WASSERMAN SCHULTZ(pty:dft). Responses due by 8/19/2016 (Thomas, Gregg) (Entered: 08/02/2016)
08/02/2016	20	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Elisabeth C. Frost. Filing Fee \$ 75.00 Receipt # 113C-8968439 by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. Responses due by 8/19/2016 (Thomas, Gregg) (Entered: 08/02/2016)
08/02/2016	21	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Ruthzee Louijeune. Filing Fee \$ 75.00 Receipt # 113C-8968459 by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. Responses due by 8/19/2016 (Thomas, Gregg) (Entered: 08/02/2016)
08/02/2016	22	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Graham Wilson. Filing Fee \$ 75.00 Receipt # 113C-8968480 by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. Responses due by 8/19/2016 (Thomas, Gregg) (Entered: 08/02/2016)
08/04/2016	23	PAPERLESS ORDER granting 19 , 20 , 21 and 22 Motions to Appear Pro Hac Vice. Attorneys Marc E. Elias, Elisabeth C. Frost, Ruthzee Louijeune and Graham Wilson are permitted to appear on behalf of Defendants. Signed by Judge William J. Zloch on 8/4/2016. (bc) (Entered: 08/04/2016)
08/05/2016	24	RESPONSE in Opposition re 9 MOTION to Dismiss 1 Complaint,,,,,,,,,, MOTION for Extension of Time to File Response/Reply/Answer filed by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN

BETTERLEY, HARRIS, BERHOFF, JENNIFER BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL

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RODERICK, JEFF, ROGERS, DOMINIC, RONZANI, SUSAN
ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA
SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON,
SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH,
ELESHA SNYDER, ERICH SPARKS, ALAINA TALBOY,
FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN,
GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS
VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY
JASMINE WELCH, REBECCA WHITE-HAYES, CAROL
WILDING, CATHERINE WILLOTT, ANNMARIE WILSON,
GREGORY WITKOWSKI, EMMA L YOUNG. Attorney Cullin
Avram O'Brien added to party MARK BEDARD(pty:pla), Attorney
Cullin Avram O'Brien added to party JEN BETTERLEY(pty:pla),
Attorney Cullin Avram O'Brien added to party BARBARA
BOWEN(pty:pla), Attorney Cullin Avram O'Brien added to party
RICHARD BOYLAN(pty:pla), Attorney Cullin Avram O'Brien
added to party MATTHEW JOSEPH BRADY(pty:pla), Attorney
Cullin Avram O'Brien added to party KYLE G BRAUND(pty:pla),
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BUBB(pty:pla), Attorney Cullin Avram O'Brien added to party
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O'Brien added to party BRUCE BUSTO(pty:pla), Attorney Cullin
Avram O'Brien added to party JOSEPH CALLAN(pty:pla),
Attorney Cullin Avram O'Brien added to party PATRICIA D
CASSIDY(pty:pla), Attorney Cullin Avram O'Brien added to party
SUSAN CATTERALL(pty:pla), Attorney Cullin Avram O'Brien
added to party VINCENT J CAUCHI(pty:pla), Attorney Cullin
Avram O'Brien added to party CYNTHIA T CHAN(pty:pla),
Attorney Cullin Avram O'Brien added to party TORSHA
CHILDS(pty:pla), Attorney Cullin Avram O'Brien added to party
KARLIE COLE(pty:pla), Attorney Cullin Avram O'Brien added to
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COOPER(pty:pla), Attorney Cullin Avram O'Brien added to party
YALONDA DYE COOPER(pty:pla), Attorney Cullin Avram
O'Brien added to party SUZANNE M CORK(pty:pla), Attorney
Cullin Avram O'Brien added to party RHIANNON
CRANDALL(pty:pla), Attorney Cullin Avram O'Brien added to
party WILLIAM CRANDALL(pty:pla), Attorney Cullin Avram
O'Brien added to party SHARON CRAWFORD(pty:pla), Attorney
Cullin Avram O'Brien added to party PHYLLIS

CHRISTINE(pty:pla), Attorney Cullin Avram O'Brien added to party JOHN CROWE(pty:pla), Attorney Cullin Avram O'Brien added to party CRAIG RICHARD CURRIER(pty:pla), Attorney Cullin Avram O'Brien added to party CATHERINE G CYKO(pty:pla), Attorney Cullin Avram O'Brien added to party HEATHER DADE(pty:pla), Attorney Cullin Avram O'Brien added to party ALECIA R DAVIS(pty:pla), Attorney Cullin Avram O'Brien added to party SHERRY DAVIS(pty:pla), Attorney Cullin Avram O'Brien added to party TAMMY DEITCH-COULTER(pty:pla), Attorney Cullin Avram O'Brien added to party KATHLEEN L DODGE(pty:pla), Attorney Cullin Avram O'Brien added to party DIANE EMILY DREYFUS(pty:pla), Attorney Cullin Avram O'Brien added to party DAN ELLIS DUDLEY(pty:pla), Attorney Cullin Avram O'Brien added to party AMALIE DUVALL(pty:pla), Attorney Cullin Avram O'Brien added to party ELIZA FEERO(pty:pla), Attorney Cullin Avram O'Brien added to party ERIK MICHAEL FERRAGUT(pty:pla), Attorney Cullin Avram O'Brien added to party ELIZABETH FIGUEROA(pty:pla), Attorney Cullin Avram O'Brien added to party DIANA FLORES(pty:pla), Attorney Cullin Avram O'Brien added to party WILLIAM SCOTT FRANZ(pty:pla), Attorney Cullin Avram O'Brien added to party SUSAN FRISBIE(pty:pla), Attorney Cullin Avram O'Brien added to party ERIK FURREBOE(pty:pla), Attorney Cullin Avram O'Brien added to party LISA GALE(pty:pla), Attorney Cullin Avram O'Brien added to party LAURA GENNA(pty:pla), Attorney Cullin Avram O'Brien added to party RYAN GHAN(pty:pla), Attorney Cullin Avram O'Brien added to party JOSEPH GLEASON(pty:pla), Attorney Cullin Avram O'Brien added to party JEFFREY GOLDBERG(pty:pla), Attorney Cullin Avram O'Brien added to party ESTRELLA GONZALEZ(pty:pla), Attorney Cullin Avram O'Brien added to party JOSE ALBERTO GONZALEZ(pty:pla), Attorney Cullin Avram O'Brien added to party PRABU GOPALAKRISHNAN(pty:pla), Attorney Cullin Avram O'Brien added to party LUKE GRIM(pty:pla), Attorney Cullin Avram O'Brien added to party LUCILLE GROOMS(pty:pla), Attorney Cullin Avram O'Brien added to party ANTHONY GRUDIN(pty:pla), Attorney Cullin Avram O'Brien added to party LAUREN HALE(pty:pla), Attorney Cullin Avram O'Brien added to party JULIE HAMPTON(pty:pla), Attorney Cullin Avram O'Brien added to party ZACHARY JAMES HANEY(pty:pla), Attorney Cullin Avram O'Brien added to party GAYLE ANN HARROD(pty:pla), Attorney Cullin Avram O'Brien added to party

JARATHI HEMPFILED(pty:pla), Attorney Cullin Avram O'Brien added to party KIRSTEN HOFFMAN(pty:pla), Attorney Cullin Avram O'Brien added to party REBECCA HOHM(pty:pla), Attorney Cullin Avram O'Brien added to party KIM MARIE HOULE(pty:pla), Attorney Cullin Avram O'Brien added to party STEPHEN HOUSEKNECHT(pty:pla), Attorney Cullin Avram O'Brien added to party LEWIS L HUMISTON, IV(pty:pla), Attorney Cullin Avram O'Brien added to party KIRSTEN HURST(pty:pla), Attorney Cullin Avram O'Brien added to party BENJAMIN ILARRAZA(pty:pla), Attorney Cullin Avram O'Brien added to party BAKH INAMOV(pty:pla), Attorney Cullin Avram O'Brien added to party DANIELLE INGRASSIA(pty:pla), Attorney Cullin Avram O'Brien added to party CAROLYN JACOBSON(pty:pla), Attorney Cullin Avram O'Brien added to party TUKOI JARRETT(pty:pla), Attorney Cullin Avram O'Brien added to party TIMO A JOHANN(pty:pla), Attorney Cullin Avram O'Brien added to party TAMARA L JOHNSTON(pty:pla), Attorney Cullin Avram O'Brien added to party HEATHER JORDAN(pty:pla), Attorney Cullin Avram O'Brien added to party RANA KANGAS-KENT(pty:pla), Attorney Cullin Avram O'Brien added to party BRANDY KINCAID(pty:pla), Attorney Cullin Avram O'Brien added to party AMBER RAE KNOWLTON(pty:pla), Attorney Cullin Avram O'Brien added to party THEDA LARSON-WRIGHT(pty:pla), Attorney Cullin Avram O'Brien added to party PEGGY LEW(pty:pla), Attorney Cullin Avram O'Brien added to party MELISSA LIANG(pty:pla), Attorney Cullin Avram O'Brien added to party SARAH LOPEZ(pty:pla), Attorney Cullin Avram O'Brien added to party EDWIN LUGO(pty:pla), Attorney Cullin Avram O'Brien added to party JOHN LYNCH(pty:pla), Attorney Cullin Avram O'Brien added to party SEAN LYNCH(pty:pla), Attorney Cullin Avram O'Brien added to party CHRISTINE MAIURANO(pty:pla), Attorney Cullin Avram O'Brien added to party MELISSA MARCOTTE(pty:pla), Attorney Cullin Avram O'Brien added to party RAYMOND D MAXWELL(pty:pla), Attorney Cullin Avram O'Brien added to party LISA ANNE MENEELY(pty:pla), Attorney Cullin Avram O'Brien added to party DAVID L MEULI(pty:pla), Attorney Cullin Avram O'Brien added to party GRETA MICKEY(pty:pla), Attorney Cullin Avram O'Brien added to party CARL MILLER(pty:pla), Attorney Cullin Avram O'Brien added to party TERI MONACO(pty:pla), Attorney Cullin Avram O'Brien added to party ANGELA MONSON(pty:pla), Attorney Cullin Avram O'Brien added to party BRITTANY R MUSICK(pty:pla),

Case: 17-14194 Date Filed: 02/28/2018 Page: 105 of 225
Attorney Cullin Avram O'Brien added to party DANIEL

O'MEARA(pty:pla), Attorney Cullin Avram O'Brien added to party
ANDREW ORRINO(pty:pla), Attorney Cullin Avram O'Brien
added to party STEVE PHILIPP(pty:pla), Attorney Cullin Avram
O'Brien added to party SUSAN PHILLIPS(pty:pla), Attorney
Cullin Avram O'Brien added to party JANE ELLEN
PLATTNER(pty:pla), Attorney Cullin Avram O'Brien added to
party ALETTE PRICHETT(pty:pla), Attorney Cullin Avram
O'Brien added to party MARLOWE ST. CLOUD
PRIMACK(pty:pla), Attorney Cullin Avram O'Brien added to party
KENNETH E PUCKETT(pty:pla), Attorney Cullin Avram O'Brien
added to party DAVID PULASKI(pty:pla), Attorney Cullin Avram
O'Brien added to party DAVID N PYLES(pty:pla), Attorney Cullin
Avram O'Brien added to party MICHAEL S REED(pty:pla),
Attorney Cullin Avram O'Brien added to party SUSAN
REED(pty:pla), Attorney Cullin Avram O'Brien added to party
VALERIE ELYSE RESCH(pty:pla), Attorney Cullin Avram
O'Brien added to party DANIEL J REYNOLDS(pty:pla), Attorney
Cullin Avram O'Brien added to party STANLEY RIFKEN(pty:pla),
Attorney Cullin Avram O'Brien added to party DIANE
ROBINSON(pty:pla), Attorney Cullin Avram O'Brien added to
party RACHEL RODERICK(pty:pla), Attorney Cullin Avram
O'Brien added to party JEFF ROGERS(pty:pla), Attorney Cullin
Avram O'Brien added to party DOMINIC RONZANI(pty:pla),
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Cullin Avram O'Brien added to party MATTHEW SHAW(pty:pla),
Attorney Cullin Avram O'Brien added to party ZEKE
SHAW(pty:pla), Attorney Cullin Avram O'Brien added to party
JAMES SIMON(pty:pla), Attorney Cullin Avram O'Brien added to
party SUSAN L SINGER(pty:pla), Attorney Cullin Avram O'Brien
added to party ERIKA SITZER(pty:pla), Attorney Cullin Avram
O'Brien added to party BRENDA LEE SMITH(pty:pla), Attorney
Cullin Avram O'Brien added to party ELESYA SNYDER(pty:pla),
Attorney Cullin Avram O'Brien added to party ERICH
SPARKS(pty:pla), Attorney Cullin Avram O'Brien added to party
ALAINA TALBOY(pty:pla), Attorney Cullin Avram O'Brien added
to party FELICIA MICHELLE TAYLOR(pty:pla), Attorney Cullin
Avram O'Brien added to party BRETT TEEGARDIN(pty:pla),
Attorney Cullin Avram O'Brien added to party GEORGE

		THOMAS (pty:pla), Attorney Cullin Avram O'Brien added to party LAURA MICHELLE VAUGHN(pty:pla), Attorney Cullin Avram O'Brien added to party CARLOS VILLAMAR(pty:pla), Attorney Cullin Avram O'Brien added to party RICK WASHIK(pty:pla), Attorney Cullin Avram O'Brien added to party DUFFY ROBERT WEISS(pty:pla), Attorney Cullin Avram O'Brien added to party MARY JASMINE WELCH(pty:pla), Attorney Cullin Avram O'Brien added to party REBECCA WHITE-HAYES(pty:pla), Attorney Cullin Avram O'Brien added to party CAROL WILDING(pty:pla), Attorney Cullin Avram O'Brien added to party CATHERINE WILLOTT(pty:pla), Attorney Cullin Avram O'Brien added to party ANNMARIE WILSON(pty:pla), Attorney Cullin Avram O'Brien added to party GREGORY WITKOWSKI(pty:pla), Attorney Cullin Avram O'Brien added to party EMMA L YOUNG(pty:pla). Replies due by 8/15/2016. (Attachments: # 1 Exhibit 1 - Death Report of Plaintiffs Process Server, Shawn Lucas, Who Died on August 2, 2016)(O'Brien, Cullin) (Entered: 08/05/2016)
08/09/2016	25	ORDER SETTING EVIDENTIARY HEARING Setting Hearing on Motion 9 MOTION to Quash Service of Process 1 Complaint MOTION for Extension of Time to File Response/Reply/Answer : Evidentiary Hearing is hereby set for 8/23/2016 11:00 AM in Fort Lauderdale Division before Judge William J. Zloch. Signed by Judge William J. Zloch on 8/9/2016. (gp) -Modified text on 8/30/2016 (gp).- (Entered: 08/10/2016)
08/15/2016	26	REPLY in Support to 11 Memorandum <i>In Support of Defendants' Motion to Quash</i> by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. (Thomas, Gregg) Modified title text on 8/15/2016 (asl). (Entered: 08/15/2016)
08/15/2016	27	AFFIDAVIT signed by : Elisabeth C. Frost. re 26 Response/Reply (Other) <i>Declaration of Elisabeth C. Frost in Support of Defendants' Reply in Support of Motion to Quash</i> by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit, # 5 Exhibit, # 6 Exhibit, # 7 Exhibit, # 8 Exhibit, # 9 Exhibit, # 10 Exhibit, # 11 Exhibit)(Thomas, Gregg) (Entered: 08/15/2016)
08/16/2016	28	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Bruce V. Spiva. Filing Fee \$ 75.00 Receipt # 113C-9007829 by DNC SERVICES CORPORATION, DEBORAH WASSERMAN

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 SCHULZ. Responses due by 9/2/2016 (Thomas, Gregg) (Entered: 08/16/2016)

08/17/2016

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Unopposed MOTION to Bring Electronic Equipment into the courtroom by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R

Case: MUSIC, DANIEL COMEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC RONZANI, SUSAN ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESHA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY JASMINE WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L YOUNG. Attorney Elizabeth Lee Beck added to party MARK BEDARD(pty:pla), Attorney Elizabeth Lee Beck added to party JEN BETTERLEY(pty:pla), Attorney Elizabeth Lee Beck added to party BARBARA BOWEN(pty:pla), Attorney Elizabeth Lee Beck added to party RICHARD BOYLAN(pty:pla), Attorney Elizabeth Lee Beck added to party MATTHEW JOSEPH BRADY(pty:pla), Attorney Elizabeth Lee Beck added to party KYLE G BRAUND(pty:pla), Attorney Elizabeth Lee Beck added to party CHRIS BUBB(pty:pla), Attorney Elizabeth Lee Beck added to party TRISTAN BURGNER(pty:pla), Attorney Elizabeth Lee Beck added to party D.J. BUSCHINI(pty:pla), Attorney Elizabeth Lee Beck added to party BRUCE BUSTO(pty:pla), Attorney Elizabeth Lee Beck added to party JOSEPH CALLAN(pty:pla), Attorney Elizabeth Lee Beck added to party PATRICIA D CASSIDY(pty:pla), Attorney Elizabeth Lee Beck added to party SUSAN CATTERALL(pty:pla), Attorney Elizabeth Lee Beck added to party VINCENT J CAUCHI(pty:pla), Attorney Elizabeth Lee Beck added to party CYNTHIA T CHAN(pty:pla), Attorney Elizabeth Lee Beck added to party TORSHA CHILDS(pty:pla), Attorney Elizabeth Lee Beck added to party KARLIE COLE(pty:pla), Attorney Elizabeth Lee Beck added to party AIMEE R COLEMAN(pty:pla), Attorney Elizabeth Lee Beck added to party ROSALIE CONSIGLIO(pty:pla), Attorney Elizabeth Lee Beck added to party DANIEL S COOPER(pty:pla), Attorney Elizabeth Lee Beck added to party YALONDA DYE COOPER(pty:pla), Attorney Elizabeth Lee Beck added to party

Case SUZIANNE MCGREK(pty:pla), Attorney Elizabeth Lee Beck added to party RHIANNON CRANDALL(pty:pla), Attorney Elizabeth Lee Beck added to party WILLIAM CRANDALL(pty:pla), Attorney Elizabeth Lee Beck added to party SHARON CRAWFORD(pty:pla), Attorney Elizabeth Lee Beck added to party PHYLLIS CRIDDLE(pty:pla), Attorney Elizabeth Lee Beck added to party JOHN CROWE(pty:pla), Attorney Elizabeth Lee Beck added to party CRAIG RICHARD CURRIER(pty:pla), Attorney Elizabeth Lee Beck added to party CATHERINE G CYKO(pty:pla), Attorney Elizabeth Lee Beck added to party HEATHER DADE(pty:pla), Attorney Elizabeth Lee Beck added to party ALECIA R DAVIS(pty:pla), Attorney Elizabeth Lee Beck added to party SHERRY DAVIS(pty:pla), Attorney Elizabeth Lee Beck added to party TAMMY DEITCH-COULTER(pty:pla), Attorney Elizabeth Lee Beck added to party KATHLEEN L DODGE(pty:pla), Attorney Elizabeth Lee Beck added to party DIANE EMILY DREYFUS(pty:pla), Attorney Elizabeth Lee Beck added to party DAN ELLIS DUDLEY(pty:pla), Attorney Elizabeth Lee Beck added to party AMALIE DUVALL(pty:pla), Attorney Elizabeth Lee Beck added to party ELIZA FEERO(pty:pla), Attorney Elizabeth Lee Beck added to party ERIK MICHAEL FERRAGUT(pty:pla), Attorney Elizabeth Lee Beck added to party ELIZABETH FIGUEROA(pty:pla), Attorney Elizabeth Lee Beck added to party DIANA FLORES(pty:pla), Attorney Elizabeth Lee Beck added to party WILLIAM SCOTT FRANZ(pty:pla), Attorney Elizabeth Lee Beck added to party SUSAN FRISBIE(pty:pla), Attorney Elizabeth Lee Beck added to party ERIK FURREBOE(pty:pla), Attorney Elizabeth Lee Beck added to party LISA GALE(pty:pla), Attorney Elizabeth Lee Beck added to party LAURA GENNA(pty:pla), Attorney Elizabeth Lee Beck added to party RYAN GHAN(pty:pla), Attorney Elizabeth Lee Beck added to party JOSEPH GLEASON(pty:pla), Attorney Elizabeth Lee Beck added to party JEFFREY GOLDBERG(pty:pla), Attorney Elizabeth Lee Beck added to party ESTRELLA GONZALEZ(pty:pla), Attorney Elizabeth Lee Beck added to party JOSE ALBERTO GONZALEZ(pty:pla), Attorney Elizabeth Lee Beck added to party PRABU GOPALAKRISHNAN(pty:pla), Attorney Elizabeth Lee Beck added to party LUKE GRIM(pty:pla), Attorney Elizabeth Lee Beck added to party LUCILLE GROOMS(pty:pla), Attorney Elizabeth Lee Beck added to party ANTHONY GRUDIN(pty:pla), Attorney Elizabeth Lee Beck added to party LAUREN HALE(pty:pla), Attorney Elizabeth Lee Beck added to party JULIE HAMPTON(pty:pla), Attorney Elizabeth Lee

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Beck added to party ZACHARY JAMES HANSEN(pty:pla),
Attorney Elizabeth Lee Beck added to party GAYLE ANN
HARROD(pty:pla), Attorney Elizabeth Lee Beck added to party
JARATH HEMPHILL(pty:pla), Attorney Elizabeth Lee Beck added
to party KIRSTEN HOFFMAN(pty:pla), Attorney Elizabeth Lee
Beck added to party REBECCA HOHM(pty:pla), Attorney
Elizabeth Lee Beck added to party KIM MARIE HOULE(pty:pla),
Attorney Elizabeth Lee Beck added to party STEPHEN
HOUSEKNECHT(pty:pla), Attorney Elizabeth Lee Beck added to
party LEWIS L HUMISTON, IV(pty:pla), Attorney Elizabeth Lee
Beck added to party KIRSTEN HURST(pty:pla), Attorney
Elizabeth Lee Beck added to party BENJAMIN
ILARRAZA(pty:pla), Attorney Elizabeth Lee Beck added to party
BAKH INAMOV(pty:pla), Attorney Elizabeth Lee Beck added to
party DANIELLE INGRASSIA(pty:pla), Attorney Elizabeth Lee
Beck added to party CAROLYN JACOBSON(pty:pla), Attorney
Elizabeth Lee Beck added to party TUKOI JARRETT(pty:pla),
Attorney Elizabeth Lee Beck added to party TIMO A
JOHANN(pty:pla), Attorney Elizabeth Lee Beck added to party
TAMARA L JOHNSTON(pty:pla), Attorney Elizabeth Lee Beck
added to party HEATHER JORDAN(pty:pla), Attorney Elizabeth
Lee Beck added to party RANA KANGAS-KENT(pty:pla),
Attorney Elizabeth Lee Beck added to party BRANDY
KINCAID(pty:pla), Attorney Elizabeth Lee Beck added to party
AMBER RAE KNOWLTON(pty:pla), Attorney Elizabeth Lee Beck
added to party THEDA LARSON-WRIGHT(pty:pla), Attorney
Elizabeth Lee Beck added to party PEGGY LEW(pty:pla), Attorney
Elizabeth Lee Beck added to party MELISSA LIANG(pty:pla),
Attorney Elizabeth Lee Beck added to party SARAH
LOPEZ(pty:pla), Attorney Elizabeth Lee Beck added to party
EDWIN LUGO(pty:pla), Attorney Elizabeth Lee Beck added to
party JOHN LYNCH(pty:pla), Attorney Elizabeth Lee Beck added
to party SEAN LYNCH(pty:pla), Attorney Elizabeth Lee Beck
added to party CHRISTINE MAIURANO(pty:pla), Attorney
Elizabeth Lee Beck added to party MELISSA
MARCOTTE(pty:pla), Attorney Elizabeth Lee Beck added to party
RAYMOND D MAXWELL(pty:pla), Attorney Elizabeth Lee Beck
added to party LISA ANNE MENEELY(pty:pla), Attorney
Elizabeth Lee Beck added to party DAVID L MEULI(pty:pla),
Attorney Elizabeth Lee Beck added to party GRETA
MICKEY(pty:pla), Attorney Elizabeth Lee Beck added to party
CARL MILLER(pty:pla), Attorney Elizabeth Lee Beck added to
party TERI MONACO(pty:pla), Attorney Elizabeth Lee Beck

added to party ANGELA MCDONALD(pty:pla), Attorney Elizabeth Lee Beck added to party BRITTANY R MUSICK(pty:pla), Attorney Elizabeth Lee Beck added to party DANIEL O'MEARA(pty:pla), Attorney Elizabeth Lee Beck added to party ANDREW ORRINO(pty:pla), Attorney Elizabeth Lee Beck added to party STEVE PHILIPP(pty:pla), Attorney Elizabeth Lee Beck added to party SUSAN PHILLIPS(pty:pla), Attorney Elizabeth Lee Beck added to party JANE ELLEN PLATTNER(pty:pla), Attorney Elizabeth Lee Beck added to party ALETTE PRICHETT(pty:pla), Attorney Elizabeth Lee Beck added to party MARLOWE ST. CLOUD PRIMACK(pty:pla), Attorney Elizabeth Lee Beck added to party KENNETH E PUCKETT(pty:pla), Attorney Elizabeth Lee Beck added to party DAVID PULASKI(pty:pla), Attorney Elizabeth Lee Beck added to party DAVID N PYLES(pty:pla), Attorney Elizabeth Lee Beck added to party MICHAEL S REED(pty:pla), Attorney Elizabeth Lee Beck added to party SUSAN REED(pty:pla), Attorney Elizabeth Lee Beck added to party VALERIE ELYSE RESCH(pty:pla), Attorney Elizabeth Lee Beck added to party DANIEL J REYNOLDS(pty:pla), Attorney Elizabeth Lee Beck added to party STANLEY RIFKEN(pty:pla), Attorney Elizabeth Lee Beck added to party DIANE ROBINSON(pty:pla), Attorney Elizabeth Lee Beck added to party RACHEL RODERICK(pty:pla), Attorney Elizabeth Lee Beck added to party JEFF ROGERS(pty:pla), Attorney Elizabeth Lee Beck added to party DOMINIC RONZANI(pty:pla), Attorney Elizabeth Lee Beck added to party SUSAN ROPPEL(pty:pla), Attorney Elizabeth Lee Beck added to party ANDREW ROUSSEAU(pty:pla), Attorney Elizabeth Lee Beck added to party LISA SETTLE(pty:pla), Attorney Elizabeth Lee Beck added to party JULIANNA SEYMOUR(pty:pla), Attorney Elizabeth Lee Beck added to party MATTHEW SHAW(pty:pla), Attorney Elizabeth Lee Beck added to party ZEKE SHAW(pty:pla), Attorney Elizabeth Lee Beck added to party JAMES SIMON(pty:pla), Attorney Elizabeth Lee Beck added to party SUSAN L SINGER(pty:pla), Attorney Elizabeth Lee Beck added to party ERIKA SITZER(pty:pla), Attorney Elizabeth Lee Beck added to party BRENDA LEE SMITH(pty:pla), Attorney Elizabeth Lee Beck added to party ELESHA SNYDER(pty:pla), Attorney Elizabeth Lee Beck added to party ERICH SPARKS(pty:pla), Attorney Elizabeth Lee Beck added to party ALAINA TALBOY(pty:pla), Attorney Elizabeth Lee Beck added to party FELICIA MICHELLE TAYLOR(pty:pla), Attorney Elizabeth Lee Beck added to party BRETT TEEGARDIN(pty:pla), Attorney

	Case 17-11194 Document 31-1 Filed 08/17/2016 Page 1 of 1	<p>Elizabeth Lee Beck added to party GEORGE THOMAS(pty:pla), Attorney Elizabeth Lee Beck added to party LAURA MICHELLE VAUGHN(pty:pla), Attorney Elizabeth Lee Beck added to party CARLOS VILLAMAR(pty:pla), Attorney Elizabeth Lee Beck added to party RICK WASHIK(pty:pla), Attorney Elizabeth Lee Beck added to party DUFFY ROBERT WEISS(pty:pla), Attorney Elizabeth Lee Beck added to party MARY JASMINE WELCH(pty:pla), Attorney Elizabeth Lee Beck added to party REBECCA WHITE-HAYES(pty:pla), Attorney Elizabeth Lee Beck added to party CAROL WILDING(pty:pla), Attorney Elizabeth Lee Beck added to party CATHERINE WILLOTT(pty:pla), Attorney Elizabeth Lee Beck added to party ANNMARIE WILSON(pty:pla), Attorney Elizabeth Lee Beck added to party GREGORY WITKOWSKI(pty:pla), Attorney Elizabeth Lee Beck added to party EMMA L YOUNG(pty:pla). Responses due by 9/6/2016 (Attachments: # 1 Exhibit A - Proposed Order)(Beck, Elizabeth) (Entered: 08/17/2016)</p>
08/17/2016	30	<p>PAPERLESS ORDER granting 28 Motion to Appear Pro Hac Vice. Attorney Bruce V. Spiva is permitted to appear on behalf of Defendants. Signed by Judge William J. Zloch on 8/17/2016. (bc) (Entered: 08/17/2016)</p>
08/18/2016	31	<p>Plaintiff's MOTION in Limine to <i>Exclude the Declarations of Rebecca Herries, Lindsey Reynolds, and Robert F. Bauer, and Other Inadmissible Hearsay</i> by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH</p>

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BIELEHOF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC

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 RONZANI, SUSAN AND ROPPEL, ANDREW W. ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESNA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY JASMINE WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L YOUNG.. (O'Brien, Cullin) (Entered: 08/19/2016)

08/19/2016

[33](#)

Exhibit List (*Plaintiffs*) for August 23, 2016 Evidentiary Hearing by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE

Case: INGRASSIA, CAROLYN / ACBSON, TIKOZ, ARRETT, TIMO

A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC RONZANI, SUSAN ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESHA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY JASMINE WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L YOUNG.. (Attachments: # [1](#) Exhibit 1 (Police Report Regarding death of process server Shawn Lucas), # [2](#) Exhibit 2 (E-mail from police confirming death), # [3](#) Exhibit 6 (Still pictures of video of service of process), # [4](#) Exhibit 7 (Facebook pictures of Rebecca Herries), # [5](#) Exhibit 8 (5/11/2016 email from Rebecca Herries), # [6](#) Exhibit 9 (Facebook profile pictures of Shawn Lucas)(O'Brien, Cullin) (Entered: 08/19/2016)

08/19/2016

[34](#)

ORDER granting [29](#) Motion to Bring Electronic Equipment into the courtroom. Signed by Judge William J. Zloch on 8/19/2016. (bc) (Entered: 08/19/2016)

08/19/2016

[35](#)

ORDER granting [31](#) Motion in Limine. Signed by Judge William J. Zloch on 8/19/2016. (bc) (Entered: 08/19/2016)

08/22/2016

[36](#)

NOTICE by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ re [33](#) Exhibit List,,,,,,,,,,,,, *Defendants*

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 Notice Regarding Witnesses and Exhibits (Thomas, Gregg)
 (Entered: 08/22/2016)

08/23/2016

[37](#)

Minute Entry for proceedings held before Judge William J. Zloch: Evidentiary Hearing held on 8/23/2016. Witness Ricardo Villalba-Cabral testified. Court Reporter: Tammy Nestor, 954-769-5488 / Tammy_Nestor@flsd.uscourts.gov (bc) (Additional attachment(s) added on 8/24/2016: # [1](#) Plaintiffs' Exhibit List, # [2](#) Defendants' Exhibit List) (bc). (Entered: 08/24/2016)

08/24/2016

[38](#)

MEMORANDUM of Law *POST-HEARING* by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA

Case: 17-1304 - Wright, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC RONZANI, SUSAN ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESHA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY JASMINE WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L YOUNG. (O'Brien, Cullin) (Entered: 08/24/2016)

08/25/2016

[39](#)

RESPONSE/REPLY to [38](#) Memorandum,,,,,,,,,,,,, *Opposition to Plaintiff's Post-Hearing Memorandum* by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. (Thomas, Gregg) (Entered: 08/25/2016)

08/29/2016

[40](#)

ORDER Granting [9](#) Motion to Quash Service of Process or, in the Alternative, [9](#) Motion for Extension of Time to File Response/Reply/Answer. Service of Process as to Defendant DNC Services Corporation, d/b/a Democratic National Committee, and Defendant Deborah Wasserman Schultz be and the same is hereby QUASHED. Plaintiffs be and the same are hereby ordered to serve Defendant DNC Services Corporation, d/b/a Democratic National Committee, and Defendant Deborah Wasserman Schultz within the time prescribed by law. Signed by Judge William J. Zloch on 8/29/2016. (gp) (Entered: 08/30/2016)

09/02/2016

[41](#)

SUMMONS (Affidavit) Returned Executed on [1](#) Complaint,,,,,,,,,,,,, [8](#) Amended Complaint,,,,,,,,,,,,, with a 21 day response/answer filing deadline by FELICIA MICHELLE TAYLOR, KENNETH E

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PUCKETT, DAVID L GROOMS, PRISTAN BURGNER, KIRSTEN HOFFMAN, MELISSA MARCOTTE, CATHERINE G CYKO, ZACHARY JAMES HANEY, JOHN CROWE, RACHEL RODERICK, HEATHER DADE, BRENDA LEE SMITH, CAROLYN JACOBSON, TIMO A JOHANN, RHIANNON CRANDALL, SARAH LOPEZ, MARIANNE BLAIR, NANCY BERNERS-LEE, DAVID L MEULI, HARRIS BIERHOFF, ERIKA SITZER, LAUREN HALE, SUSAN REED, ALAINA TALBOY, RICK WASHIK, REBECCA WHITE-HAYES, STEFANIE BIRDSONG, EMMA L YOUNG, ALETTE PRICHETT, PATRICIA D CASSIDY, SUSAN CATTERALL, CARL MILLER, GRETA MICKEY, MATTHEW SHAW, ERICH SPARKS, LISA SETTLE, DIANA FLORES, SUSAN ROPPEL, THEDA LARSON-WRIGHT, LEWIS L HUMISTON, IV, LISA ANNE MENEELY, LESTER JOHN BATES, III, RICHARD BOYLAN, DANIEL S COOPER, CHRIS BUBB, STANLEY RIFKEN, ESTRELLA GONZALEZ, BARBARA BOWEN, PHYLLIS CRIDDLE, PRABU GOPALAKRISHNAN, DIANE ROBINSON, CRAIG RICHARD CURRIER, GAYLE ANN HARROD, ELESHA SNYDER, ZEKE SHAW, MELISSA LIANG, DANIELLE INGRASSIA, ELIZA FEERO, KAYITE ASHCRAFT, DANIEL O'MEARA, BRUCE BUSTO, ANDREW ORRINO, RICHARD BOOKER, BRETT TEEGARDIN, JEFF ROGERS, TERI MONACO, LISA GALE, JANE ELLEN PLATTNER, RANA KANGAS-KENT, KIRSTEN HURST, TORSHA CHILDS, JOSEPH CALLAN, CATHERINE WILLOTT, KIMBERLY ALBERTS, DAVID PULASKI, SUSAN L SINGER, MATTHEW JOSEPH BRADY, TAMARA L JOHNSTON, JOSE ALBERTO GONZALEZ, KARLIE COLE, DANIEL J REYNOLDS, SUSAN FRISBIE, CHRISTINE MAIURANO, MARK BEDARD, STEVE PHILIPP, JOHN LYNCH, YALONDA DYE COOPER, SHERRY DAVIS, DIANE EMILY DREYFUS, AMALIE DUVALL, CYNTHIA T CHAN, ANTHONY GRUDIN, TIMOTHY BINGEN, JOSEPH GLEASON, TUKOI JARRETT, DAVID N PYLES, ANNMARIE WILSON, TAMMY DEITCH-COULTER, SEAN LYNCH, D.J. BUSCHINI, JEFFREY GOLDBERG, ALECIA R DAVIS, CONNIE ANDERSON, ANDREW ROUSSEAU, HEATHER JORDAN, ELIZABETH FIGUEROA, ANGELA MONSON, LUKE GRIM, MICHAEL S REED, LAURA MICHELLE VAUGHN, JULIE HAMPTON, LAURA GENNA, JULIANNA SEYMOUR, EDWIN LUGO, JARATH HEMPHILL, BENJAMIN ILARRAZA, ERIK FURREBOE, GEORGE THOMAS, CAROL WILDING, SUSAN PHILLIPS,

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 KATHLEEN DODGE, RAYMOND D MAXWELL, BRITTANY R MUSICK, BAKH INAMOV, PEGGY LEW, ERIK MICHAEL FERRAGUT, MARLOWE ST. CLOUD PRIMACK, GREGORY WITKOWSKI, CARLOS VILLAMAR, JAMES SIMON, STEPHEN HOUSEKNECHT, REBECCA HOHM, RYAN GHAN, ROSALIE CONSIGLIO, BRANDY KINCAID, VALERIE ELYSE RESCH, AIMEE R COLEMAN, SUZANNE M CORK, VINCENT J CAUCHI, MARY JASMINE WELCH, DAN ELLIS DUDLEY, SHARON CRAWFORD, WILLIAM CRANDALL, AMBER RAE KNOWLTON, KIM MARIE HOULE, DOMINIC RONZANI, DUFFY ROBERT WEISS, WILLIAM SCOTT FRANZ, KYLE G BRAUND, JEN BETTERLEY. DNC SERVICES CORPORATION served on 8/31/2016, answer due 9/21/2016. (Beck, Elizabeth) (Entered: 09/02/2016)

09/02/2016

[42](#) SUMMONS (Affidavit) Returned Executed on [1](#) Complaint,,,,,,,,, [8](#) Amended Complaint,,,,,,,,, with a 21 day response/answer filing deadline by FELICIA MICHELLE TAYLOR, KENNETH E PUCKETT, LUCILLE GROOMS, TRISTAN BURGNER, KIRSTEN HOFFMAN, MELISSA MARCOTTE, CATHERINE G CYKO, ZACHARY JAMES HANEY, JOHN CROWE, RACHEL RODERICK, HEATHER DADE, BRENDA LEE SMITH, CAROLYN JACOBSON, TIMO A JOHANN, RHIANNON CRANDALL, SARAH LOPEZ, MARIANNE BLAIR, NANCY BERNERS-LEE, DAVID L MEULI, HARRIS BIERHOFF, ERIKA SITZER, LAUREN HALE, SUSAN REED, ALAINA TALBOY, RICK WASHIK, REBECCA WHITE-HAYES, STEFANIE BIRDSONG, EMMA L YOUNG, ALETTE PRICHETT, PATRICIA D CASSIDY, SUSAN CATTERALL, CARL MILLER, GRETA MICKEY, MATTHEW SHAW, ERICH SPARKS, LISA SETTLE, DIANA FLORES, SUSAN ROPPEL, THEDA LARSON-WRIGHT, LEWIS L HUMISTON, IV, LISA ANNE MENEELY, LESTER JOHN BATES, III, RICHARD BOYLAN, DANIEL S COOPER, CHRIS BUBB, STANLEY RIFKEN, ESTRELLA GONZALEZ, BARBARA BOWEN, PHYLLIS CRIDDLE, PRABU GOPALAKRISHNAN, DIANE ROBINSON, CRAIG RICHARD CURRIER, GAYLE ANN HARROD, ELESHA SNYDER, ZEKE SHAW, MELISSA LIANG, DANIELLE INGRASSIA, ELIZA FEERO, KAYITE ASHCRAFT, DANIEL O'MEARA, BRUCE BUSTO, ANDREW ORRINO, RICHARD BOOKER, BRETT TEEGARDIN, JEFF ROGERS, TERI MONACO, LISA GALE, JANE ELLEN PLATTNER, RANA KANGAS-KENT, KIRSTEN HURST, TORSHA CHILDS,

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 JOSEPH CALLAN, CATHERINE WHELOTT, KIMBERLY ALBERTS, DAVID PULASKI, SUSAN L SINGER, MATTHEW JOSEPH BRADY, TAMARA L JOHNSTON, JOSE ALBERTO GONZALEZ, KARLIE COLE, DANIEL J REYNOLDS, SUSAN FRISBIE, CHRISTINE MAIURANO, MARK BEDARD, STEVE PHILIPP, JOHN LYNCH, YALONDA DYE COOPER, SHERRY DAVIS, DIANE EMILY DREYFUS, AMALIE DUVALL, CYNTHIA T CHAN, ANTHONY GRUDIN, TIMOTHY BINGEN, JOSEPH GLEASON, TUKOI JARRETT, DAVID N PYLES, ANNMARIE WILSON, TAMMY DEITCH-COULTER, SEAN LYNCH, D.J. BUSCHINI, JEFFREY GOLDBERG, ALECIA R DAVIS, CONNIE ANDERSON, ANDREW ROUSSEAU, HEATHER JORDAN, ELIZABETH FIGUEROA, ANGELA MONSON, LUKE GRIM, MICHAEL S REED, LAURA MICHELLE VAUGHN, JULIE HAMPTON, LAURA GENNA, JULIANNA SEYMOUR, EDWIN LUGO, JARATH HEMPHILL, BENJAMIN ILARRAZA, ERIK FURREBOE, GEORGE THOMAS, CAROL WILDING, SUSAN PHILLIPS, KATHLEEN L DODGE, RAYMOND D MAXWELL, BRITTANY R MUSICK, BAKH INAMOV, PEGGY LEW, ERIK MICHAEL FERRAGUT, MARLOWE ST. CLOUD PRIMACK, GREGORY WITKOWSKI, CARLOS VILLAMAR, JAMES SIMON, STEPHEN HOUSEKNECHT, REBECCA HOHM, RYAN GHAN, ROSALIE CONSIGLIO, BRANDY KINCAID, VALERIE ELYSE RESCH, AIMEE R COLEMAN, SUZANNE M CORK, VINCENT J CAUCHI, MARY JASMINE WELCH, DAN ELLIS DUDLEY, SHARON CRAWFORD, WILLIAM CRANDALL, AMBER RAE KNOWLTON, KIM MARIE HOULE, DOMINIC RONZANI, DUFFY ROBERT WEISS, WILLIAM SCOTT FRANZ, KYLE G BRAUND, JEN BETTERLEY. DEBORAH WASSERMAN SCHULTZ served on 8/31/2016, answer due 9/21/2016. (Beck, Elizabeth) (Entered: 09/02/2016)

09/02/2016

[43](#)

NOTICE by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS,

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KARLIE COLE, AMBER COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC RONZANI, SUSAN ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESHA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY

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 ROBERT WEISS, MARY JASMIN WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L YOUNG re [42](#) Summons Returned Executed,,,,,, [41](#) Summons Returned Executed,,,,,, *PLAINTIFFS' NOTICE OF FILING PROOFS OF SERVICE* (Beck, Elizabeth) (Entered: 09/02/2016)

09/21/2016	44	MOTION to Dismiss 8 Amended Complaint,,,,,, by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. Responses due by 10/11/2016 (Thomas, Gregg) (Entered: 09/21/2016)
09/21/2016	45	AFFIDAVIT signed by : Patrice Taylor. re 44 MOTION to Dismiss 8 Amended Complaint,,,,,, <i>Declaration in Support of Motion to Dismiss</i> by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ (Thomas, Gregg) (Entered: 09/21/2016)
09/21/2016	46	AFFIDAVIT signed by : Elisabeth C. Frost. re 44 MOTION to Dismiss 8 Amended Complaint,,,,,, <i>Declaration in Support of Motion to Dismiss</i> by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit, # 5 Exhibit, # 6 Exhibit, # 7 Exhibit, # 8 Exhibit, # 9 Exhibit, # 10 Exhibit, # 11 Exhibit) (Thomas, Gregg) (Entered: 09/21/2016)
09/21/2016	47	NOTICE by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ re 44 MOTION to Dismiss 8 Amended Complaint,,,,,, <i>Notice of Filing Proposed Order Granting Motion to Dismiss</i> (Attachments: # 1 Text of Proposed Order) (Thomas, Gregg) (Entered: 09/21/2016)
10/04/2016	48	RESPONSE in Opposition re 44 MOTION to Dismiss 8 Amended Complaint,,,,,, filed by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSOING, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL,

Case SHARON CRAWFORD, THYLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVAL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC RONZANI, SUSAN ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESNA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY JASMINE WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L

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 YOUNG, Replies due by 10/14/2016 (O'Brien, Cullin) (Entered: 10/04/2016)

10/14/2016	49	REPLY to 44 MOTION to Dismiss 8 Amended Complaint,,,,,,,,,,,,, Reply in Support of Motion to Dismiss by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. (Thomas, Gregg) (Entered: 10/14/2016)
04/10/2017	50	ORDER Setting Hearing on Motion 44 MOTION to Dismiss 8 Amended Complaint: Oral Argument set for 4/25/2017 at 1:30 PM in Fort Lauderdale Division before Senior Judge William J. Zloch. Signed by Senior Judge William J. Zloch on 4/10/2017. (pes) (Entered: 04/10/2017)
04/10/2017	51	NOTICE of Attorney Appearance by Mark Richard Caramanica on behalf of DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. Attorney Mark Richard Caramanica added to party DNC SERVICES CORPORATION(pty:dft), Attorney Mark Richard Caramanica added to party DEBORAH WASSERMAN SCHULTZ(pty:dft). (Caramanica, Mark) (Entered: 04/10/2017)
04/11/2017	52	NOTICE of Attorney Appearance by Beverly Virues on behalf of KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG,

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ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC RONZANI, SUSAN ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESHA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY JASMINE WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L YOUNG. Attorney Beverly Virues added to party KIMBERLY ALBERTS(pty:pla), Attorney Beverly Virues added to party CONNIE ANDERSON(pty:pla), Attorney Beverly Virues added to party KAYITE ASHCRAFT(pty:pla), Attorney Beverly Virues added to party LESTER JOHN BATES, III(pty:pla), Attorney Beverly Virues added to party MARK BEDARD(pty:pla), Attorney Beverly Virues added to party NANCY BERNERS-LEE(pty:pla), Attorney Beverly Virues added to party JEN BETTERLEY(pty:pla), Attorney Beverly Virues added to party

Attorney Beverly Virues added to party DANIELLE
DUDLEY(pty:pla), Attorney Beverly Virues added to party
AMALIE DUVALL(pty:pla), Attorney Beverly Virues added to
party ELIZA FEERO(pty:pla), Attorney Beverly Virues added to
party ERIK MICHAEL FERRAGUT(pty:pla), Attorney Beverly
Virues added to party ELIZABETH FIGUEROA(pty:pla), Attorney
Beverly Virues added to party DIANA FLORES(pty:pla), Attorney
Beverly Virues added to party WILLIAM SCOTT
FRANZ(pty:pla), Attorney Beverly Virues added to party SUSAN
FRISBIE(pty:pla), Attorney Beverly Virues added to party ERIK
FURREBOE(pty:pla), Attorney Beverly Virues added to party
LISA GALE(pty:pla), Attorney Beverly Virues added to party
LAURA GENNA(pty:pla), Attorney Beverly Virues added to party
RYAN GHAN(pty:pla), Attorney Beverly Virues added to party
JOSEPH GLEASON(pty:pla), Attorney Beverly Virues added to
party JEFFREY GOLDBERG(pty:pla), Attorney Beverly Virues
added to party ESTRELLA GONZALEZ(pty:pla), Attorney
Beverly Virues added to party JOSE ALBERTO
GONZALEZ(pty:pla), Attorney Beverly Virues added to party
PRABU GOPALAKRISHNAN(pty:pla), Attorney Beverly Virues
added to party LUKE GRIM(pty:pla), Attorney Beverly Virues
added to party LUCILLE GROOMS(pty:pla), Attorney Beverly
Virues added to party ANTHONY GRUDIN(pty:pla), Attorney
Beverly Virues added to party LAUREN HALE(pty:pla), Attorney
Beverly Virues added to party JULIE HAMPTON(pty:pla),
Attorney Beverly Virues added to party ZACHARY JAMES
HANEY(pty:pla), Attorney Beverly Virues added to party GAYLE
ANN HARROD(pty:pla), Attorney Beverly Virues added to party
JARATH HEMPHILL(pty:pla), Attorney Beverly Virues added to
party KIRSTEN HOFFMAN(pty:pla), Attorney Beverly Virues
added to party REBECCA HOHM(pty:pla), Attorney Beverly
Virues added to party KIM MARIE HOULE(pty:pla), Attorney
Beverly Virues added to party STEPHEN
HOUSEKNECHT(pty:pla), Attorney Beverly Virues added to party
LEWIS L HUMISTON, IV(pty:pla), Attorney Beverly Virues
added to party KIRSTEN HURST(pty:pla), Attorney Beverly
Virues added to party BENJAMIN ILARRAZA(pty:pla), Attorney
Beverly Virues added to party BAKH INAMOV(pty:pla), Attorney
Beverly Virues added to party DANIELLE INGRASSIA(pty:pla),
Attorney Beverly Virues added to party CAROLYN
JACOBSON(pty:pla), Attorney Beverly Virues added to party
TUKOI JARRETT(pty:pla), Attorney Beverly Virues added to
party TIMO A JOHANN(pty:pla), Attorney Beverly Virues added

		<p>RACHAEL RODERICK(pty:pla), Attorney Beverly Virues added to party JEFF ROGERS(pty:pla), Attorney Beverly Virues added to party DOMINIC RONZANI(pty:pla), Attorney Beverly Virues added to party SUSAN ROPPEL(pty:pla), Attorney Beverly Virues added to party ANDREW ROUSSEAU(pty:pla), Attorney Beverly Virues added to party LISA SETTLE(pty:pla), Attorney Beverly Virues added to party JULIANNA SEYMOUR(pty:pla), Attorney Beverly Virues added to party MATTHEW SHAW(pty:pla), Attorney Beverly Virues added to party ZEKE SHAW(pty:pla), Attorney Beverly Virues added to party JAMES SIMON(pty:pla), Attorney Beverly Virues added to party SUSAN L SINGER(pty:pla), Attorney Beverly Virues added to party ERIKA SITZER(pty:pla), Attorney Beverly Virues added to party BRENDA LEE SMITH(pty:pla), Attorney Beverly Virues added to party ELESHA SNYDER(pty:pla), Attorney Beverly Virues added to party ERICH SPARKS(pty:pla), Attorney Beverly Virues added to party ALAINA TALBOY(pty:pla), Attorney Beverly Virues added to party FELICIA MICHELLE TAYLOR(pty:pla), Attorney Beverly Virues added to party BRETT TEEGARDIN(pty:pla), Attorney Beverly Virues added to party GEORGE THOMAS(pty:pla), Attorney Beverly Virues added to party LAURA MICHELLE VAUGHN(pty:pla), Attorney Beverly Virues added to party CARLOS VILLAMAR(pty:pla), Attorney Beverly Virues added to party RICK WASHIK(pty:pla), Attorney Beverly Virues added to party DUFFY ROBERT WEISS(pty:pla), Attorney Beverly Virues added to party MARY JASMINE WELCH(pty:pla), Attorney Beverly Virues added to party REBECCA WHITE-HAYES(pty:pla), Attorney Beverly Virues added to party CAROL WILDING(pty:pla), Attorney Beverly Virues added to party CATHERINE WILLOTT(pty:pla), Attorney Beverly Virues added to party ANNMARIE WILSON(pty:pla), Attorney Beverly Virues added to party GREGORY WITKOWSKI(pty:pla), Attorney Beverly Virues added to party EMMA L YOUNG(pty:pla). (Virues, Beverly) (Entered: 04/11/2017)</p>
04/25/2017	53	<p>Minute Entry for proceedings held before Senior Judge William J. Zloch: Motion Hearing held on 4/25/2017 re 44 Motion to Dismiss 8 Amended Complaint. Court Reporter: Francine Salopek, 954-769-5657 / Francine_Salopek@flsd.uscourts.gov. (bc) (Entered: 04/28/2017)</p>
04/28/2017	54	<p>TRANSCRIPT of Motion Hearing held on 4-25-17 before Senior Judge William J. Zloch, Volume Number 1 of 1, 1-123 pages, Court Reporter: Francine Salopek, 954-769-5657 /</p>

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 Francine_Salopek@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter Francine Salopek before the deadline for Release of Transcript Restriction. After that date it may be obtained through the Court Reporter Francine Salopek or PACER. Redaction Request due 5/19/2017. Redacted Transcript Deadline set for 5/30/2017. Release of Transcript Restriction set for 7/27/2017. (fs) (Entered: 04/28/2017)

06/01/2017

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NOTICE by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW,

06/02/2017

[56](#)

REPLY to [55](#) Notice (Other),,,,,,,,,, *Defendants' Reply to Plaintiffs' June 1, 2017 Notice* by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. (Thomas, Gregg) (Entered: 06/02/2017)

06/13/2017

[57](#)

Plaintiff's MOTION for Order of Protection and Request for Hearing by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE,

CRAIG RICHARD CURRER, CATHERINE CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC RONZANI, SUSAN ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESHA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY JASMINE WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L YOUNG. (Attachments: # [1](#) Exhibit 1 (Declaration of Employee

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 Doe), # [2](#) Exhibit 2 (submitted under seal), # [3](#) Exhibit 3 (submitted under seal), # [4](#) Exhibit 4 (submitted under seal), # [5](#) Exhibit 5 (Declaration of Named Plaintiff Angela Monson))(O'Brien, Cullin) (Entered: 06/13/2017)

06/14/2017	58	RESPONSE to Motion re 57 Plaintiff's MOTION for Order of Protection and Request for Hearing filed by DNC SERVICES CORPORATION, DEBORAH WASSERMAN SCHULTZ. Replies due by 6/21/2017. (Thomas, Gregg) (Entered: 06/14/2017)
06/15/2017		SYSTEM ENTRY - Docket Entry 59 [motion] restricted/sealed until further notice. (cbr) (Entered: 06/15/2017)
06/15/2017	60	ORDER denying 57 Motion For Order Of Protection And Request For Hearing. Signed by Senior Judge William J. Zloch on 6/15/2017. (bc) (Entered: 06/15/2017)
06/22/2017		SYSTEM ENTRY - Docket Entry 61 [order] restricted/sealed until further notice. (cbr) (Entered: 06/22/2017)
08/25/2017	62	Final Order of Dismissal. Closing Case. Signed by Senior Judge William J. Zloch on 8/25/2017. (bc) NOTICE: If there are sealed documents in this case, they may be unsealed after 1 year or as directed by Court Order, unless they have been designated to be permanently sealed. See Local Rule 5.4 and Administrative Order 2014-69. (Entered: 08/25/2017)
09/08/2017	63	Notice of Appeal as to 62 Order Dismissing Case, by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS,

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 SHERY DAVIS, TAMMY DITCHCOCKER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL, ELIZA FEERO, ERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC RONZANI, SUSAN ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESHA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY JASMINE WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L YOUNG. Filing fee \$ 505.00 receipt number 113C-10029718. Within fourteen days of the filing date of a Notice of Appeal, the appellant must complete the

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 Eleventh Circuit Transcript Order Form regardless

of whether transcripts are being ordered [Pursuant to FRAP 10(b)]. For information go to our FLSD website under Transcript Information. (Beck, Elizabeth) (Entered: 09/08/2017)

09/18/2017

Transmission of Notice of Appeal. Order Under Appeal and Docket Sheet to US Court of Appeals re [63](#) Notice of Appeal, Notice has been electronically mailed. (amb) (Entered: 09/18/2017)

09/21/2017

[64](#)

Acknowledgment of Receipt of NOA from USCA re [63](#) Notice of Appeal filed by HEATHER JORDAN, ZEKE SHAW, DUFFY ROBERT WEISS, JOSE ALBERTO GONZALEZ, LUCILLE GROOMS, CARLOS VILLAMAR, KATHLEEN L DODGE, DAVID N PYLES, KIMBERLY ALBERTS, CAROLYN JACOBSON, LUKE GRIM, WILLIAM SCOTT FRANZ, BARBARA BOWEN, JANE ELLEN PLATTNER, JULIANNA SEYMOUR, AMALIE DUVALL, CAROL WILDING, TORSHA CHILDS, LISA GALE, CHRIS BUBB, DOMINIC RONZANI, ANGELA MONSON, PRABU GOPALAKRISHNAN, BRUCE BUSTO, JULIE HAMPTON, ANNMARIE WILSON, BENJAMIN ILARRAZA, RACHEL RODERICK, KARLIE COLE, STEVE PHILIPP, ANDREW ROUSSEAU, LAURA MICHELLE VAUGHN, RICHARD BOYLAN, DIANA FLORES, JEFF ROGERS, SUSAN PHILLIPS, LAURA GENNA, CONNIE ANDERSON, REBECCA WHITE-HAYES, DANIELLE INGRASSIA, DANIEL J REYNOLDS, LESTER JOHN BATES, III, RHIANNON CRANDALL, CHRISTINE MAIURANO, ELESHA SNYDER, D.J. BUSCHINI, JOSEPH CALLAN, GRETA MICKEY, CARL MILLER, TRISTAN BURGNER, BRANDY KINCAID, EMMA L YOUNG, BRITTANY R MUSICK, SUSAN CATTERALL, THEDA LARSON-WRIGHT, DAN ELLIS DUDLEY, MICHAEL S REED, ERIK FURREBOE, MARLOWE ST. CLOUD PRIMACK, DANIEL S COOPER, YALONDA DYE COOPER, MELISSA MARCOTTE, VINCENT J CAUCHI, ANTHONY GRUDIN, DIANE ROBINSON, SUSAN L SINGER, GREGORY WITKOWSKI, BRETT TEEGARDIN, MELISSA LIANG, SUSAN REED, ESTRELLA GONZALEZ, TAMARA L JOHNSTON, DAVID PULASKI, CYNTHIA T CHAN, CATHERINE WILLOTT, TAMMY DEITCH-COULTER, PEGGY LEW, AIMEE R COLEMAN, LISA SETTLE, DAVID L MEULI, REBECCA HOHM, ALETTE PRICHETT, ERIK MICHAEL FERRAGUT, TUKOI JARRETT, KIRSTEN HURST, RAYMOND D MAXWELL, LISA ANNE MENEELY, RANA KANGAS-KENT, AMBER RAE KNOWLTON, KIM MARIE HOULE,

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 FELICIA MCDONALD, TAYLOR, STANLEY, RYAN, EDWIN LUGO, WILLIAM CRANDALL, VALERIE ELYSE RESCH, DANIEL O'MEARA, SHERRY DAVIS, HEATHER DADE, SUSAN ROPPEL, BAKH INAMOV, JAMES SIMON, MARK BEDARD, JOSEPH GLEASON, ELIZABETH FIGUEROA, MARIANNE BLAIR, LEWIS L HUMISTON, IV, JEFFREY GOLDBERG, PHYLLIS CRIDDLE, NANCY BERNERS-LEE, ALECIA R DAVIS, MARY JASMINE WELCH, JARATH HEMPHILL, JOHN CROWE, JOHN LYNCH, RICK WASHIK, SEAN LYNCH, RICHARD BOOKER, SUZANNE M CORK, STEPHEN HOUSEKNECHT, TIMOTHY BINGEN, ERICH SPARKS, ALAINA TALBOY, HARRIS BIERHOFF, CRAIG RICHARD CURRIER, KENNETH E PUCKETT, DIANE EMILY DREYFUS, LAUREN HALE, PATRICIA D CASSIDY, GEORGE THOMAS, KAYITE ASHCRAFT, TERI MONACO, ZACHARY JAMES HANEY, STEFANIE BIRDSONG, ELIZA FEERO, BRENDA LEE SMITH, MATTHEW SHAW, SUSAN FRISBIE, ANDREW ORRINO, CATHERINE G CYKO, KIRSTEN HOFFMAN, ERIKA SITZER, SHARON CRAWFORD, GAYLE ANN HARROD, TIMO A JOHANN, JEN BETTERLEY, SARAH LOPEZ, ROSALIE CONSIGLIO, KYLE G BRAUND, MATTHEW JOSEPH BRADY, RYAN GHAN. Date received by USCA: 9/19/2017. USCA Case Number: 17-14194-A. (apz) (Entered: 09/21/2017)

09/22/2017

[65](#)

TRANSCRIPT INFORMATION FORM by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY,

AMALIA DUVA, ELIZABETH FIGUEROA, JERIK MICHAEL FERRAGUT, ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC RONZANI, SUSAN ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESHA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY JASMINE WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L YOUNG re [63](#) Notice of Appeal,,,,,,,,,,,,, hearing transcript(s) ordered. Order placed by Elizabeth Lee Beck. Email sent to Court Reporter Coordinator. (Beck, Elizabeth) (Entered: 09/22/2017)

09/27/2017	66	TRANSCRIPT NOTIFICATION - has been filed on 4-28-17, Docket Entry 54, by Francine Salopek re 65 Transcript Information Form. (fs) (Entered: 09/27/2017)
10/02/2017	67	COURT REPORTER ACKNOWLEDGMENT re 65 Transcript Information Form,,,,,,,,, 63 Notice of Appeal,,,,,,,,, Court Reporter: Tammy Nestor, 954-769-5488 / Tammy_Nestor@flsd.uscourts.gov. (tnr) (Entered: 10/02/2017)
10/13/2017	68	TRANSCRIPT of hearing held on 8/23/16 before Senior Judge William J. Zloch, 1-76 pages, re: 63 Notice of Appeal,,,,,,,,, Court Reporter: Tammy Nestor, 954-769-5488 / Tammy_Nestor@flsd.uscourts.gov. USCA Case Number: 17-14194. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 11/3/2017. Redacted Transcript Deadline set for 11/13/2017. Release of Transcript Restriction set for 1/11/2018. (tnr) (Entered: 10/13/2017)
10/13/2017	69	TRANSCRIPT NOTIFICATION - Transcript(s) ordered on: 9/26/17 by Elizabeth Beck, Esq. has/have been filed by Court Reporter: Tammy Nestor, 954-769-5488 / Tammy_Nestor@flsd.uscourts.gov re 67 Court Reporter Acknowledgment, 65 Transcript Information Form,,,,,,,,, 63 Notice of Appeal,,,,,,,,, (tnr) (Entered: 10/13/2017)
01/17/2018	70	NOTICE by KIMBERLY ALBERTS, CONNIE ANDERSON, KAYITE ASHCRAFT, LESTER JOHN BATES, III, MARK BEDARD, NANCY BERNERS-LEE, JEN BETTERLEY, HARRIS BIERHOFF, TIMOTHY BINGEN, STEFANIE BIRDSONG, MARIANNE BLAIR, RICHARD BOOKER, BARBARA BOWEN, RICHARD BOYLAN, MATTHEW JOSEPH BRADY, KYLE G BRAUND, CHRIS BUBB, TRISTAN BURGNER, D.J. BUSCHINI, BRUCE BUSTO, JOSEPH CALLAN, PATRICIA D CASSIDY, SUSAN CATTERALL, VINCENT J CAUCHI, CYNTHIA T CHAN, TORSHA CHILDS, KARLIE COLE, AIMEE R COLEMAN, ROSALIE CONSIGLIO, DANIEL S COOPER, YALONDA DYE COOPER, SUZANNE M CORK, RHIANNON CRANDALL, WILLIAM CRANDALL, SHARON CRAWFORD, PHYLLIS CRIDDLE, JOHN CROWE, CRAIG RICHARD CURRIER, CATHERINE G CYKO, HEATHER DADE, ALECIA R DAVIS, SHERRY DAVIS, TAMMY DEITCH-COULTER, KATHLEEN L DODGE, DIANE EMILY DREYFUS, DAN ELLIS DUDLEY, AMALIE DUVALL,

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ELIZABETH FIGUEROA, DIANA FLORES, WILLIAM SCOTT FRANZ, SUSAN FRISBIE, ERIK FURREBOE, LISA GALE, LAURA GENNA, RYAN GHAN, JOSEPH GLEASON, JEFFREY GOLDBERG, ESTRELLA GONZALEZ, JOSE ALBERTO GONZALEZ, PRABU GOPALAKRISHNAN, LUKE GRIM, LUCILLE GROOMS, ANTHONY GRUDIN, LAUREN HALE, JULIE HAMPTON, ZACHARY JAMES HANEY, GAYLE ANN HARROD, JARATH HEMPHILL, KIRSTEN HOFFMAN, REBECCA HOHM, KIM MARIE HOULE, STEPHEN HOUSEKNECHT, LEWIS L HUMISTON, IV, KIRSTEN HURST, BENJAMIN ILARRAZA, BAKH INAMOV, DANIELLE INGRASSIA, CAROLYN JACOBSON, TUKOI JARRETT, TIMO A JOHANN, TAMARA L JOHNSTON, HEATHER JORDAN, RANA KANGAS-KENT, BRANDY KINCAID, AMBER RAE KNOWLTON, THEDA LARSON-WRIGHT, PEGGY LEW, MELISSA LIANG, SARAH LOPEZ, EDWIN LUGO, JOHN LYNCH, SEAN LYNCH, CHRISTINE MAIURANO, MELISSA MARCOTTE, RAYMOND D MAXWELL, LISA ANNE MENEELY, DAVID L MEULI, GRETA MICKEY, CARL MILLER, TERI MONACO, ANGELA MONSON, BRITTANY R MUSICK, DANIEL O'MEARA, ANDREW ORRINO, STEVE PHILIPP, SUSAN PHILLIPS, JANE ELLEN PLATTNER, ALETTE PRICHETT, MARLOWE ST. CLOUD PRIMACK, KENNETH E PUCKETT, DAVID PULASKI, DAVID N PYLES, MICHAEL S REED, SUSAN REED, VALERIE ELYSE RESCH, DANIEL J REYNOLDS, STANLEY RIFKEN, DIANE ROBINSON, RACHEL RODERICK, JEFF ROGERS, DOMINIC RONZANI, SUSAN ROPPEL, ANDREW ROUSSEAU, LISA SETTLE, JULIANNA SEYMOUR, MATTHEW SHAW, ZEKE SHAW, JAMES SIMON, SUSAN L SINGER, ERIKA SITZER, BRENDA LEE SMITH, ELESHA SNYDER, ERICH SPARKS, ALAINA TALBOY, FELICIA MICHELLE TAYLOR, BRETT TEEGARDIN, GEORGE THOMAS, LAURA MICHELLE VAUGHN, CARLOS VILLAMAR, RICK WASHIK, DUFFY ROBERT WEISS, MARY JASMINE WELCH, REBECCA WHITE-HAYES, CAROL WILDING, CATHERINE WILLOTT, ANNMARIE WILSON, GREGORY WITKOWSKI, EMMA L YOUNG *NOTICE OF FILING OF JANUARY 10, 2018 ORDER FROM THE U.S. 11TH CIRCUIT COURT OF APPEALS AND OF PLAINTIFFS SECOND AMENDED COMPLAINT* (Attachments: # [1](#) Exhibit A - January 10, 2018 Order from the U.S. 11th Circuit

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Court of Appeals, #2-17-0018- Plaintiffs Second Amended
Complaint) (O'Brien, Cullin) (Entered: 01/17/2018)

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TAB/DOCKET NO.

1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

FORT LAUDERDALE DIVISION

CASE NO.

CAROL WILDING; STANLEY RIFKEN;
SHARON CRAWFORD; WILLIAM SCOTT
FRANZ; DAVID PULASKI; MARY
JASMINE WELCH; JOSE ALBERTO
GONZALEZ; JANE ELLEN PLATTNER;
KIM MARIE HOULE; TIMOTHY BINGEN;
SUSAN REED; ANGELA MONSON; AIMEE
R. COLEMAN; ELESHA SNYDER;
MATTHEW SHAW; ZACHARY JAMES
HANEY; ESTRELLA GONZALEZ;
CATHERINE G. CYKO; LAURA GENNA;
MARIANNE BLAIR; TAMARA L.
JOHNSTON; VALERIE ELYSE RESCH;
BRETT TEEGARDIN; DANIEL O'MEARA;
PEGGY LEW; DANIEL J. REYNOLDS;
BRENDA LEE SMITH; MARLOWE ST.
CLOUD PRIMACK; PATRICIA D.
CASSIDY; BRITTANY R. MUSICK;
HARRIS BIERHOFF; FELICIA MICHELLE
TAYLOR; SUSAN L. SINGER; KYLE G.
BRAUND; LAUREN HALE; WILLIAM
CRANDALL; KIRSTEN HURST; DUFFY
ROBERT WEISS; CONNIE ANDERSON;
GREGORY WITKOWSKI; ELIZABETH
FIGUEROA; BRANDY KINCAID;
KIMBERLY ALBERTS; RACHEL
RODERICK; LAURA MICHELLE
VAUGHN; TWANA SPARKS; LISA GALE;
TAMMY DEITCH-COULTER; KAYITE
ASHCRAFT; ALECIA R. DAVIS; DOMINIC
RONZANI; LUKE GRIM; ROSALIE
CONSIGLIO; EDWIN LUGO; HEATHER
DADE; MICHAEL S. REED; RHIANNON
CRANDALL; KATHRYN BAILEY; RYAN
GHAN; LISA SETTLE; YALONDA DYE
COOPER; DANIEL S. COOPER; MATTHEW
JOSEPH BRADY; ANDREW ROUSSEAU;

COMPLAINT- CLASS ACTION

DEMAND FOR JURY TRIAL

SUSAN CATTERALL; JULIE HAMPTON;
CHRIS BUBB; ERIK FURREBOE; ZEKE
SHAW; BENJAMIN ILARRAZA; LUCILLE
GROOMS; CHRISTINE MAIURANO;
LEWIS L. HUMISTON, IV; JOHN LYNCH;
JAMES SIMON; LESTER JOHN BATES, III;
JEFFREY GOLDBERG; RICK WASHIK;
RICHARD BOOKER; KARLIE COLE;
ERICH SPARKS; PRABU
GOPALAKRISHNAN; CARLOS
VILLAMAR; CAROLYN JACOBSON; DAN
ELLIS DUDLEY; LISA ANNE MENEELY;
D.J. BUSCHINI; RAYMOND D.
MAXWELL; DAVID L. MEULI; KENNETH
E. PUCKETT; DAVID N. PYLES; CYNTHIA
T. CHAN; STEFANIE BIRDSONG; AMBER
RAE KNOWLTON; TIMO A. JOHANN;
JEFF ROGERS; HEATHER JORDAN; RANA
KANGAS-KENT; SUSAN FRISBIE; BAKH
INAMOV; THEDA LARSON-WRIGHT;
KIRSTEN HOFFMAN; ANTHONY
GRUDIN; BRUCE BUSTO; SUZANNE M.
CORK; EMMA L. YOUNG; SEAN LYNCH;
SHERRY DAVIS; NANCY BERNERS-LEE;
PHYLLIS CRIDDLE; AUSTIN DREIS-
ORNELAS; MELISSA LIANG; JOSEPH
GLEASON; GRETA MICKEY; DIANE
EMILY DREYFUS; KATHLEEN L. DODGE;
CATHERINE WILLOTT; TRISTAN
BURGENER; SHARON JANIS; and ERIK
MICHAEL FERRAGUT, individually, and on
behalf of all those similarly situated,

Plaintiffs,

vs.

DNC SERVICES CORPORATION, d/b/a
DEMOCRATIC NATIONAL COMMITTEE;
and DEBORAH "DEBBIE" WASSERMAN
SCHULTZ,

Defendants.

PLAINTIFFS CAROL WILDING; STANLEY RIFKEN; SHARON CRAWFORD;
WILLIAM SCOTT FRANZ; DAVID PULASKI; MARY JASMINE WELCH; JOSE
ALBERTO GONZALEZ; JANE ELLEN PLATTNER; KIM MARIE HOULE; TIMOTHY
BINGEN; SUSAN REED; ANGELA MONSON; AIMEE R. COLEMAN; ELESHA SNYDER;
MATTHEW SHAW; ZACHARY JAMES HANEY; ESTRELLA GONZALEZ; CATHERINE
G. CYKO; LAURA GENNA; MARIANNE BLAIR; TAMARA L. JOHNSTON; VALERIE
ELYSE RESCH; BRETT TEEGARDIN; DANIEL O'MEARA; PEGGY LEW; DANIEL J.
REYNOLDS; BRENDA LEE SMITH; MARLOWE ST. CLOUD PRIMACK; PATRICIA D.
CASSIDY; BRITTANY R. MUSICK; HARRIS BIERHOFF; FELICIA MICHELLE TAYLOR;
SUSAN L. SINGER; KYLE G. BRAUND; LAUREN HALE; WILLIAM CRANDALL;
KIRSTEN HURST; DUFFY ROBERT WEISS; CONNIE ANDERSON; GREGORY
WITKOWSKI; ELIZABETH FIGUEROA; BRANDY KINCAID; KIMBERLY ALBERTS;
RACHEL RODERICK; LAURA MICHELLE VAUGHN; TWANA SPARKS; LISA GALE;
TAMMY DEITCH-COULTER; KAYITE ASHCRAFT; ALECIA R. DAVIS; DOMINIC
RONZANI; LUKE GRIM; ROSALIE CONSIGLIO; EDWIN LUGO; HEATHER DADE;
MICHAEL S. REED; RHIANNON CRANDALL; KATHRYN BAILEY; RYAN GHAN; LISA
SETTLE; YALONDA DYE COOPER; DANIEL S. COOPER; MATTHEW JOSEPH BRADY;
ANDREW ROUSSEAU; SUSAN CATTERALL; JULIE HAMPTON; CHRIS BUBB; ERIK
FURREBOE; ZEKE SHAW; BENJAMIN ILARRAZA; LUCILLE GROOMS; CHRISTINE
MAIURANO; LEWIS L. HUMISTON, IV; JOHN LYNCH; JAMES SIMON; LESTER JOHN
BATES, III; JEFFREY GOLDBERG; RICK WASHIK; RICHARD BOOKER; KARLIE COLE;
ERICH SPARKS; PRABU GOPALAKRISHNAN; CARLOS VILLAMAR; CAROLYN
JACOBSON; DAN ELLIS DUDLEY; LISA ANNE MENEELY; D.J. BUSCHINI; RAYMOND

D. MAXWELL; DAVID L. MEULI; KENNETH E. PUCKETT; DAVID N. PYLES;
CYNTHIA T. CHAN; STEFANIE BIRDSONG; AMBER RAE KNOWLTON; TIMO A.
JOHANN; JEFF ROGERS; HEATHER JORDAN; RANA KANGAS-KENT; SUSAN FRISBIE;
BAKH INAMOV; THEDA LARSON-WRIGHT; KIRSTEN HOFFMAN; ANTHONY
GRUDIN; BRUCE BUSTO; SUZANNE M. CORK; EMMA L. YOUNG; SEAN LYNCH;
SHERRY DAVIS; NANCY BERNERS-LEE; PHYLLIS CRIDDLE; AUSTIN DREIS-
ORNELAS; MELISSA LIANG; JOSEPH GLEASON; GRETA MICKEY; DIANE EMILY
DREYFUS; KATHLEEN L. DODGE; CATHERINE WILLOTT; TRISTAN BURGNER;
SHARON JANIS; and ERIK MICHAEL FERRAGUT (collectively, “Plaintiffs”), individually
and on behalf of all those similarly situated, by and through undersigned counsel, hereby sue
Defendants, DNC SERVICES CORPORATION d/b/a DEMOCRATIC NATIONAL
COMMITTEE and DEBORAH “DEBBIE” WASSERMAN SCHULTZ (collectively,
“Defendants”), and allege the following:

JURISDICTION AND VENUE

1. This Court has original jurisdiction over the claims asserted herein individually and on behalf of the class pursuant to 28 U.S.C. §1332(d), as amended in February 2005 by the Class Action Fairness Act. Alternatively, this Court has original jurisdiction under 28 U.S.C. §1332(a). Subject matter jurisdiction is proper because: (1) the amount in controversy in this class action exceeds five million dollars, exclusive of interest and costs; and (2) a substantial number of the members of the proposed classes are citizens of a state different from that of Defendants. Personal jurisdiction is proper as both Defendants have purposefully availed themselves of the privilege of conducting business activities within this District, and Defendant, Deborah “Debbie” Wasserman Schultz resides in and is a Congresswoman representing portions

of this District. Venue is proper in this judicial district under 28 U.S.C. §1391(b)(1) because both Defendants are deemed to reside in this District and under 28 U.S.C. §1391(b)(2) because both Defendants conduct business in this District and a substantial part of the acts or omissions giving rise to the claims set forth herein occurred in this District.

THE PARTIES AND CERTAIN RELEVANT NON-PARTIES

Plaintiffs

2. Plaintiff Carol Wilding (“Wilding”) is a resident of Pompano Beach, Florida. She contributed a total of \$445.50 to Bernie Sanders’ presidential campaign via ActBlue.

3. Plaintiff Stanley Rifken (“Rifken”) is a resident of New York, New York. He contributed a total of \$552.00 to Bernie Sanders’ presidential campaign via ActBlue.

4. Plaintiff Sharon Crawford (“Crawford”) is a resident of Ashville, North Carolina. She contributed a total of \$600.00 to Bernie Sanders’ presidential campaign via ActBlue.

5. Plaintiff William Scott Franz (“Franz”) is a resident of Costa Mesa, California. He contributed a total of \$2,447.00 to Bernie Sanders’ presidential campaign via ActBlue.

6. Plaintiff David Pulaski (“Pulaski”) is a resident of Houston, Texas. He contributed a total of \$254.10 to Bernie Sanders’ presidential campaign via ActBlue.

7. Plaintiff Mary Jasmine Welch (“Welch”) is a resident of Portland, Oregon. She contributed a total of \$2,447.00 to Bernie Sanders’ presidential campaign via ActBlue.

8. Plaintiff Jose Alberto Gonzalez (“J. Gonzalez”) is a resident of Pharr, Texas. He contributed a total of \$25.00 to Bernie Sanders’ presidential campaign via ActBlue.

9. Plaintiff Jane Ellen Plattner (“Plattner”) is a resident of Golden, Colorado. She contributed a total of \$1,700.00 to Bernie Sanders’ presidential campaign via ActBlue.

10. Plaintiff Kim Marie Houle (“Houle”) is a resident of Brooklyn, Connecticut. She contributed a total of \$445.00 to Bernie Sanders’ presidential campaign via ActBlue.

11. Plaintiff Timothy Bingen (“Bingen”) is a resident of Minot, North Dakota. He contributed a total of \$379.00 to Bernie Sanders’ presidential campaign via ActBlue.

12. Plaintiff Susan Reed (“S. Reed”) is a resident of Rockville, Maryland. She contributed a total of \$1,289.00 to Bernie Sanders’ presidential campaign via ActBlue.

13. Plaintiff Angela Monson (“Monson”) is a resident of Dassel, Minnesota. She contributed a total of \$350.00 to Bernie Sanders’ presidential campaign via ActBlue.

14. Plaintiff Aimee R. Coleman (“Coleman”) is a resident of Chattanooga, Tennessee. She contributed a total of \$2,544.13 to Bernie Sanders’ presidential campaign via ActBlue.

15. Plaintiff Elesha Snyder (“Snyder”) is a resident of Dayton, Ohio. She contributed a total of \$365.50 to Bernie Sanders’ presidential campaign via ActBlue.

16. Plaintiff Matthew Shaw (“M. Shaw”) is a resident of Leawood, Kansas. He contributed a total of \$222.00 to Bernie Sanders’ presidential campaign via ActBlue.

17. Plaintiff Zachary James Haney (“Haney”) is a resident of Roxbury, Massachusetts. He contributed a total of \$91.50 to Bernie Sanders’ presidential campaign via ActBlue.

18. Plaintiff Estrella Gonzalez (“E. Gonzalez”) is a resident of Fostoria, Ohio. She contributed a total of \$5.00 to Bernie Sanders’ presidential campaign via ActBlue.

19. Plaintiff Catherine G. Cyko (“Cyko”) is a resident of Aurora, Illinois. She contributed a total of \$1,156.00 to Bernie Sanders’ presidential campaign via ActBlue.

20. Plaintiff Laura Genna (“Genna”) is a resident of Bloomfield, New Jersey. She contributed a total of \$87.80 to Bernie Sanders’ presidential campaign via ActBlue.

21. Plaintiff Marianne Blair (“Blair”) is a resident of Chicago, Illinois. She contributed a total of \$2,669.50 to Bernie Sanders’ presidential campaign via ActBlue.

22. Plaintiff Tamara L. Johnston (“Johnston”) is a resident of Ozark, Missouri. She contributed a total of \$87.00 to Bernie Sanders’ presidential campaign via ActBlue.

23. Plaintiff Valerie Elyse Resch (“Resch”) is a resident of Genoa City, Wisconsin. She contributed a total of \$47.00 to Bernie Sanders’ presidential campaign via ActBlue.

24. Plaintiff Brett Teegardin (“Teegardin”) is a resident of Woodinville, Washington. He contributed a total of \$192.00 to Bernie Sanders’ presidential campaign via ActBlue.

25. Plaintiff Daniel O’Meara (“O’Meara”) is a resident of Laconia, New Hampshire. He contributed a total of \$153.00 to Bernie Sanders’ presidential campaign via ActBlue.

26. Plaintiff Peggy Lew (“Lew”) is a resident of Renton, Washington. She contributed a total of \$480.00 to Bernie Sanders’ presidential campaign via ActBlue.

27. Plaintiff Daniel J. Reynolds (“Reynolds”) is a resident of Fort Smith, Arkansas. He contributed a total of \$182.81 to Bernie Sanders’ presidential campaign via ActBlue.

28. Plaintiff Brenda Lee Smith (“Smith”) is a resident of Tallahassee, Florida. She contributed a total of \$4.00 to Bernie Sanders’ presidential campaign via ActBlue.

29. Plaintiff Marlowe St. Cloud Primack (“Primack”) is a resident of Mountain View, California. She contributed a total of \$1,082.58 to Bernie Sanders’ presidential campaign via ActBlue.

30. Plaintiff Patricia D. Cassidy (“Cassidy”) is a resident of Blandon, Pennsylvania. She contributed a total of \$1,036.00 to Bernie Sanders’ presidential campaign via ActBlue.

31. Plaintiff Brittany R. Musick (“Musick”) is a resident of Bremen, Georgia. She contributed a total of \$19.00 to Bernie Sanders’ presidential campaign via ActBlue.

32. Plaintiff Harris Bierhoff (“Bierhoff”) is a resident of Brentwood, California. He contributed a total of \$115.00 to Bernie Sanders’ presidential campaign via ActBlue.

33. Plaintiff Felicia Michelle Taylor (“Taylor”) is a resident of West Valley City, Utah. She contributed a total of \$82.00 to Bernie Sanders’ presidential campaign via ActBlue.

34. Plaintiff Susan L. Singer (“Singer”) is a resident of Niles, Illinois. She contributed a total of \$223.00 to Bernie Sanders’ presidential campaign via ActBlue.

35. Plaintiff Kyle G. Braund (“Braund”) is a resident of Dadeville, Alabama. He contributed a total of \$54.00 to Bernie Sanders’ presidential campaign via ActBlue.

36. Plaintiff Lauren Hale (“Hale”) is a resident of Portland, Maine. She contributed a total of \$35.00 to Bernie Sanders’ presidential campaign via ActBlue.

37. Plaintiff William Crandall (“W. Crandall”) is a resident of Redwood City, California. He contributed a total of \$21,705.34 to Bernie Sanders’ presidential campaign via ActBlue.

38. Plaintiff Kirsten Hurst (“Hurst”) is a resident of Nampa, Idaho. She contributed a total of \$2,447.00 to Bernie Sanders’ presidential campaign via ActBlue.

39. Plaintiff Duffy Robert Weiss (“Weiss”) is a resident of Fargo, North Dakota. He contributed a total of \$121.00 to Bernie Sanders’ presidential campaign via ActBlue.

40. Plaintiff Connie Anderson (“Anderson”) is a resident of Houston, Texas. She contributed a total of approximately \$900.00 to Bernie Sanders’ presidential campaign via ActBlue.

41. Plaintiff Gregory Witkowski (“Witkowski”) is a resident of Highland, New York. He contributed a total of \$445.00 to Bernie Sanders’ presidential campaign via ActBlue.

42. Plaintiff Elizabeth Figueroa (“Figueroa”) is a resident of Los Gatos, California. She contributed a total of \$246.50 to Bernie Sanders’ presidential campaign via ActBlue.

43. Plaintiff Brandy Kincaid (“Kincaid”) is a resident of Clarksville, Tennessee. She contributed a total of \$314.24 to Bernie Sanders’ presidential campaign via ActBlue.

44. Plaintiff Kimberly Alberts (“Alberts”) is a resident of Pittsburgh, Pennsylvania. She contributed a total of \$24.48 to Bernie Sanders’ presidential campaign via ActBlue.

45. Plaintiff Rachel Roderick (“Roderick”) is a resident of Warwick, Rhode Island. She contributed a total of \$599.15 to Bernie Sanders’ presidential campaign via ActBlue.

46. Plaintiff Laura Michelle Vaughn (“Vaughn”) is a resident of Juneau, Alaska. She contributed a total of \$238.80 to Bernie Sanders’ presidential campaign via ActBlue.

47. Plaintiff Twana Sparks (“T. Sparks”) is a resident of Silver City, New Mexico. She contributed a total of \$2,700.00 to Bernie Sanders’ presidential campaign via both ActBlue and personal checks.

48. Plaintiff Lisa Gale (“Gale”) is a resident of Hendersonville, North Carolina. She contributed a total of \$730.37 to Bernie Sanders’ presidential campaign via ActBlue.

49. Plaintiff Tammy Deitch-Coulter (“Deitch-Coulter”) is a resident of Lapeer, Michigan. She contributed a total of \$228.00 to Bernie Sanders’ presidential campaign via ActBlue.

50. Plaintiff Kayite Ashcraft (“Ashcraft”) is a resident of Charlottesville, Virginia. He contributed a total of \$2,447.00 to Bernie Sanders’ presidential campaign via ActBlue.

51. Plaintiff Alecia R. Davis (“A. Davis”) is a resident of Eureka, Montana. She contributed a total of \$531.00 to Bernie Sanders’ presidential campaign via ActBlue.

52. Plaintiff Dominic Ronzani (“Ronzani”) is a resident of Deerfield Beach, Florida. He contributed a total of \$38.54 to Bernie Sanders’ presidential campaign via ActBlue.

53. Plaintiff Luke Grim (“Grim”) is a resident of Harrisburg, Pennsylvania. He contributed a total of \$30.00 to Bernie Sanders’ presidential campaign via ActBlue.

54. Plaintiff Rosalie Consiglio (“Consiglio”) is a resident of Columbia, Maryland. She contributed a total of \$260.00 to Bernie Sanders’ presidential campaign via ActBlue.

55. Plaintiff Edwin Lugo (“Lugo”) is a resident of New York City, New York. He contributed a total of \$53.00 to Bernie Sanders’ presidential campaign via ActBlue.

56. Plaintiff Heather Dade (“Dade”) is a resident of Washington, DC. She contributed a total of \$110.00 to Bernie Sanders’ presidential campaign via ActBlue.

57. Plaintiff Michael S. Reed (“M. Reed”) is a resident of Cheyenne, Wyoming. He contributed a total of \$75.00 to Bernie Sanders’ presidential campaign via ActBlue.

58. Plaintiff Rhiannon Crandall (“R. Crandall”) is a resident of El Paso, Texas. She contributed a total of approximately \$1.00 to Bernie Sanders’ presidential campaign via ActBlue.

59. Plaintiff Kathryn Bailey Conant (“Conant”) is a resident of Harpers Ferry, West Virginia. She contributed a total of \$301.70 to Bernie Sanders’ presidential campaign via ActBlue.

60. Plaintiff Ryan Ghan (“Ghan”) is a resident of Reno, Nevada. He contributed a total of \$431.25 to Bernie Sanders’ presidential campaign via ActBlue.

61. Plaintiff Lisa Settle (“Settle”) is a resident of Newport Beach, California. She contributed a total of \$1,255.40 to Bernie Sanders’ presidential campaign via ActBlue.

62. Plaintiff Yalonda Dye Cooper (“Y. Cooper”) is a resident of Flint, Michigan. She contributed a total of 139.00 to Bernie Sanders’ presidential campaign via ActBlue.

63. Plaintiff Daniel S. Cooper (“D. Cooper”) is a resident of Flint, Michigan. He contributed a total of \$110.00 to Bernie Sanders’ presidential campaign via ActBlue.

64. Plaintiff Matthew Joseph Brady (“Brady”) is a resident of Wilmington, Delaware. He contributed a total of \$1,220.00 to Bernie Sanders’ presidential campaign via ActBlue.

65. Plaintiff Andrew Rousseau (“Rousseau”) is a resident of North Hero, Vermont. He contributed a total of \$290.00 to Bernie Sanders’ presidential campaign via ActBlue.

66. Plaintiff Susan Catterall (“Catterall”) is a resident of Hamilton, Indiana. She contributed a total of \$127.00 to Bernie Sanders’ presidential campaign via ActBlue.

67. Plaintiff Julie Hampton (“Hampton”) is a resident of Fairfield, Iowa. She contributed a total of \$277.00 to Bernie Sanders’ presidential campaign via ActBlue.

68. Plaintiff Chris Bubb (“Bubb”) is a resident of Denton, North Carolina. He contributed a total of \$92.39 to Bernie Sanders’ presidential campaign via ActBlue.

69. Plaintiff Erik Furreboe (“Furreboe”) is a resident of Mesa, Arizona. He contributed a total of \$13.00 to Bernie Sanders’ presidential campaign via ActBlue.

70. Plaintiff Zeke Shaw (“Z. Shaw”) is a resident of Acworth, Georgia. He contributed a total of \$3.00 to Bernie Sanders’ presidential campaign via ActBlue.

71. Plaintiff Benjamin Ilarraza (“Ilarraza”) is a resident of Fort Worth, Texas. He contributed a total of \$225.00 to Bernie Sanders’ presidential campaign via ActBlue.

72. Plaintiff Lucille Grooms (“Grooms”) is a resident of Boise, Idaho. She contributed a total of \$284.00 to Bernie Sanders’ presidential campaign via ActBlue.

73. Plaintiff Christine Maiurano (“Maiurano”) is a resident of Gilbertsville, New York. She contributed a total of \$530.50 to Bernie Sanders’ presidential campaign via ActBlue.

74. Plaintiff Lewis L. Humiston, IV (“Humiston”) is a resident of Auburn, Washington. He contributed a total of \$108.00 to Bernie Sanders’ presidential campaign via ActBlue.

75. Plaintiff John Lynch (“J. Lynch”) is a resident of Stuart, Florida. He contributed a total of \$1,349.00 to Bernie Sanders’ presidential campaign via ActBlue.

76. Plaintiff James Simon (“Simon”) is a resident of New York, New York. He contributed a total of \$2,700.00 to Bernie Sanders’ presidential campaign via ActBlue.

77. Plaintiff Lester John Bates, III (“Bates”) is a resident of Kurtistown, Hawaii. He contributed a total of approximately \$390.00 to Bernie Sanders’ presidential campaign via ActBlue.

78. Plaintiff Jeffrey Goldberg (“Goldberg”) is a resident of Cascade, Colorado. He contributed a total of \$82.00 to Bernie Sanders’ presidential campaign via ActBlue.

79. Plaintiff Rick Washik (“Washik”) is a resident of Potsdam, New York. He contributed a total of \$304.20 to Bernie Sanders’ presidential campaign via ActBlue.

80. Plaintiff Richard Booker (“Booker”) is a resident of Hampton, Virginia. He contributed a total of \$228.37 to Bernie Sanders’ presidential campaign via ActBlue.

81. Plaintiff Karlie Cole (“Cole”) is a resident of Minneapolis, Minnesota. She contributed a total of \$226.00 to Bernie Sanders’ presidential campaign via ActBlue.

82. Plaintiff Erich Sparks (“E. Sparks”) is a resident of Cazenovia, New York. He contributed a total of \$382.80 to Bernie Sanders’ presidential campaign via ActBlue.

83. Plaintiff Prabu Gopalakrishnan (“Gopalakrishnan”) is a resident of Chicago, Illinois. He contributed a total of \$191.00 to Bernie Sanders’ presidential campaign via ActBlue.

84. Plaintiff Carlos Villamar (“Villamar”) is a resident of Falls Church, Virginia. He contributed a total of \$195.00 to Bernie Sanders’ presidential campaign via ActBlue.

85. Plaintiff Carolyn Jacobson (“Jacobson”) is a resident of Pasadena, California. She contributed a total of \$300.00 to Bernie Sanders’ presidential campaign via ActBlue.

86. Plaintiff Dan Ellis Dudley (“Dudley”) is a resident of Douglas, Massachusetts. He contributed a total of \$773.50 to Bernie Sanders’ presidential campaign via ActBlue.

87. Plaintiff Lisa Anne Meneely (“Meneely”) is a resident of Napa, California. She contributed a total of \$105.00 to Bernie Sanders’ presidential campaign via ActBlue.

88. Plaintiff D.J. Buschini (“Buschini”) is a resident of Somerville, Massachusetts. He contributed a total of \$13.00 to Bernie Sanders’ presidential campaign via ActBlue.

89. Plaintiff Raymond D. Maxwell (“Maxwell”) is a resident of Washington, District of Columbia. He contributed a total of \$114.00 to Bernie Sanders’ presidential campaign via ActBlue.

90. Plaintiff David L. Meuli (“Meuli”) is a resident of Fairbanks, Alaska. He contributed a total of \$423.50 to Bernie Sanders’ presidential campaign via ActBlue.

91. Plaintiff Kenneth E. Puckett (“Puckett”) is a resident of Portland, Oregon. He contributed a total of \$1,972.26 to Bernie Sanders’ presidential campaign via ActBlue.

92. Plaintiff David N. Pyles (“Pyles”) is a resident of Nelson, New Hampshire. He contributed a total of \$1,005.50 to Bernie Sanders’ presidential campaign via ActBlue.

93. Plaintiff Cynthia T. Chan (“Chan”) is a resident of Athens, Georgia. She contributed a total of \$111.00 to Bernie Sanders’ presidential campaign via ActBlue.

94. Plaintiff Stefanie Birdsong (“Birdsong”) is a resident of Denver, Colorado. She contributed a total of \$159.00 to Bernie Sanders’ presidential campaign via ActBlue.

95. Plaintiff Amber Rae Knowlton (“Knowlton”) is a resident of Lancaster, Massachusetts. She contributed a total of \$277.50 to Bernie Sanders’ presidential campaign via ActBlue.

96. Plaintiff Timo A. Johann (“Johann”) is a resident of Mebane, North Carolina. He contributed a total of \$35.00 to Bernie Sanders’ presidential campaign via ActBlue.

97. Plaintiff Jeff Rogers (“Rogers”) is a resident of Seattle, Washington. He contributed a total of \$160.00 to Bernie Sanders’ presidential campaign via ActBlue.

98. Plaintiff Heather Jordan (“Jordan”) is a resident of Rogers, Arkansas. She contributed a total of \$26.50 to Bernie Sanders’ presidential campaign via ActBlue.

99. Plaintiff Rana Kangas-Kent (“Kangas-Kent”) is a resident of Greenbrae, California. She contributed a total of \$156.00 to Bernie Sanders’ presidential campaign via ActBlue.

100. Plaintiff Susan Frisbie (“Frisbie”) is a resident of Grass Valley, California. She contributed a total of \$1,456.80 to Bernie Sanders’ presidential campaign via ActBlue.

101. Plaintiff Bakh Inamov (“Inamov”) is a resident of Greenbrae, California. He contributed a total of \$187.00 to Bernie Sanders’ presidential campaign via ActBlue.

102. Plaintiff Theda Larson-Wright (“Larson-Wright”) is a resident of Arenas Valley, New Mexico. She contributed a total of \$1,012.65 to Bernie Sanders’ presidential campaign via ActBlue.

103. Plaintiff Kirsten Hoffman (“Hoffman”) is a resident of Boston, Massachusetts. She contributed a total of \$2,700.00 to Bernie Sanders’ presidential campaign via ActBlue.

104. Plaintiff Anthony Grudin (“Grudin”) is a resident of Burlington, Vermont. He contributed a total of \$64.00 to Bernie Sanders’ presidential campaign via ActBlue.

105. Plaintiff Bruce Busto (“Busto”) is a resident of Ormond Beach, Florida. He contributed a total of \$375.00 to Bernie Sanders’ presidential campaign via ActBlue.

106. Plaintiff Suzanne M. Cork (“Cork”) is a resident of Battle Mountain, Nevada. She contributed a total of \$10 to the Defendant, DNC Services Corporation D/B/A Democratic National Committee (the “DNC”) in 2016.

107. Plaintiff Emma L. Young (“Young”) is a resident of Chicago, Illinois. She contributed a total of \$15 to the DNC between December 2015 and January 2016. She contributed online.

108. Plaintiff Sean Lynch (“S. Lynch”) is a resident of Wichester, Virginia. He contributed a total of \$3 to the DNC in 2016. He contributed online.

109. Plaintiff Sherry Davis (“S. Davis”) is a resident of Longview, Washington. She contributed a total of \$173 to the DNC in 2015-2016. She contributed in various ways, including online at www.democrats.org.

110. Plaintiff Nancy Berners-Lee (“Berners-Lee”) is a resident of Lexington, Massachusetts. She contributed a total of \$100 to the DNC on or about July 20, 2015. She contributed by check.

111. Plaintiff Phyllis Criddle (“Criddle”) is a resident of North Adams, Massachusetts. She contributed a total of \$18 to the DNC on or about May 16, 2016. She contributed by check.

112. Plaintiff Austin Dreis-Ornelas (“Dreis-Ornelas”) is a resident of Plano, Texas. He contributed a total of \$30.00 to the DNC from August 2015 through January 2016. He contributed via ActBlue.

113. Plaintiff Melissa Liang (“Liang”) is a resident of Royal Oak, Michigan. She is a registered Democrat, and has been for the past 16 years.

114. Plaintiff Joseph Gleason (“Gleason”) is a resident of Seattle, Washington. He is a registered Democrat, and has been for the past eight years.

115. Plaintiff Greta Mickey (“Mickey”) is a resident of Kingston, New York. She is a registered Democrat, and has been for over 10 years.

116. Plaintiff Diane Emily Dreyfus (“Dreyfus”) is a resident of Baltimore, Maryland. She is a registered Democrat, and has been for over 40 years.

117. Plaintiff Kathleen L. Dodge (“Dodge”) is a resident of Turner Falls, Massachusetts. She is a registered Democrat, and has been for over 40 years.

118. Plaintiff Catherine Willott (“Willott”) is a resident of Thousand Oaks, California. She is a registered Democrat, and has been for 32 years.

119. Plaintiff Tristan Burgener (“Burgener”) is a resident of Meza, Arizona. He is a registered Democrat, and has been for three years.

120. Plaintiff Sharon Janis (“Janis”) is a resident of St. Petersburg, Florida. She is a registered Democrat, and has been for eight years.

121. Plaintiff Erik Michael Ferragut (“Ferragut”) is a resident of Oak Ridge, Tennessee. He is a registered Democrat, and has been for 20 years.

Defendants

122. Defendant, DNC Services Corporation, d/b/a Democratic National Committee (the “DNC”), at all times relevant hereto, was and is a not-for-profit corporation organized under the laws of the District of Columbia and is the operating body of the United States Democratic Party. The DNC maintains its principal place of business at 430 South Capitol Street Southeast in Washington, District of Columbia.

123. Defendant, Deborah “Debbie” Wasserman Schultz (“Wasserman Schultz”) has been the Chairperson of the DNC since 2011. Wasserman Schultz maintains offices in Pembroke Pines, Florida, and Aventura, Florida, in addition to offices in Washington, D.C.

Non-Party

124. Non-party ActBlue is a United States political action committee established in June 2004 that enables online fundraising for Democratic Party campaigns. ActBlue charges a 3.95% “processing” fee for each contribution. Some Plaintiffs utilized ActBlue’s online services to make the contributions referred to herein.

GENERAL FACTS

125. The DNC is the formal governing body for the United States Democratic Party. The DNC is responsible for coordinating strategy in support of Democratic Party candidates for local, state, and national office.

126. As part of its duties, the DNC organizes the Democratic National Convention every four years to nominate and confirm a candidate for President, and establishes rules for the state caucuses and primaries that choose delegates to the convention.

127. Since 2011, Wasserman Schultz has been Chairperson of the DNC. Wasserman Schultz has also served as the U.S. Representative for Florida’s 23rd congressional district since 2013; before then, she represented Florida’s 20th district in the U.S. House of Representatives starting in 2005.

128. The DNC is governed by the Charter and Bylaws of the Democratic Party. These governing documents expressly obligate the DNC to maintain a neutral posture with respect to candidates seeking the party’s nomination for President during the nominating process. Article 5, Section 4 of the Charter states:

The National Chairperson shall serve full time and shall receive such compensation as may be determined by agreement between the Chairperson and the Democratic National Committee. In the conduct and management of the affairs and procedures of the Democratic National Committee, particularly as they apply to the preparation and conduct of the Presidential nominating process, the Chairperson shall exercise impartiality and evenhandedness as between the Presidential candidates and campaigns. The Chairperson shall be responsible for ensuring that the national officers and staff of the Democratic National Committee maintain impartiality and evenhandedness during the Democratic Party Presidential nominating process.

(emphasis added).

129. Consistent with what the Charter requires, the DNC, through Wasserman Schultz and other employees, and from the very beginning of the presidential race, has consistently and publicly affirmed its impartiality and evenhandedness with respect to the nominating process for the Democratic nominee for President in 2016. For example:

- a) A September 3, 2015 article in *Politico* reporting on Wasserman Schultz's relationships with Hillary Clinton and Joe Biden quoted Wasserman Schultz as saying, "I count both Secretary Clinton and Vice President Biden as dear friends, but no matter who comprises our field of candidates it's my job to run a neutral primary process and that's what I am committed to doing[.]"¹

¹ See Edward-Isaac Doveve & Marc Caputo, "Wasserman Schultz's divided loyalties," *Politico*, available at <http://www.politico.com/story/2015/09/debbie-wasserman-schultz-joe-biden-hillary-clinton-2016-loyalty-213294> (last visited June 20, 2016).

b) A September 16, 2015 article in *The Daily Beast* on the Democratic candidate debate schedule quoted DNC spokesperson Holly Shulman (“Shuman”) as stating, “[t]he DNC runs an impartial primary process.”²

c) Shulman was also quoted in an article appearing in the Daily Mail Online (UK) on October 16, 2015, as stating, “[t]he DNC runs an impartial primary process, period.”³

d) In a CNN appearance on May 17, 2016, where she discussed alleged “violence” by supporters of Bernie Sanders at the Nevada State Democratic Convention, Wasserman Schultz stated that, “[t]he Democratic National Committee remains neutral in this primary, based on our rules.”⁴

e) In a statement quoted by the Associated Press on May 21, 2016, while discussing Sanders’ endorsement of her primary opponent for Congress, Wasserman Schultz stated, “[e]ven though Senator Sanders has endorsed my

² See Olivia Nuzzi, “Is the Democratic National Committee in the Tank for Hillary?,” **The Daily Beast**, available at <http://www.thedailybeast.com/articles/2015/09/16/is-the-democratic-national-committee-in-the-tank-for-hillary.html> (last visited June 20, 2016).

³ See David Martosko, “Democratic National Committeewoman says her party is ‘clearing a path’ for Hillary because ‘the women in charge’ want it that way,” available at <http://www.dailymail.co.uk/news/article-3273404/Democratic-National-Committeewoman-says-party-clearing-path-Hillary-women-charge-want-way.html> (last visited June 20, 2016).

⁴ The video may be viewed on the internet at http://www.realclearpolitics.com/video/2016/05/17/debbie_wasserman_schultz_what_happened_at_nevada_convention_was_unacceptable_sanders_added_fuel_to_the_fire.html (last visited June 20, 2016).

opponent, I remain, as I have been from the beginning, neutral in the presidential Democratic primary.”⁵

130. Despite the requirements in the Charter, and in spite of the multiple public declarations of neutrality and impartiality with respect to the Democratic primary process, the DNC was not neutral. To the contrary, the DNC was biased in favor of one candidate – Hillary Clinton (“Clinton”) – from the beginning and throughout the process. The DNC devoted its considerable resources to supporting Clinton above any of the other Democratic candidates. Through its public claims to being neutral and impartial, the DNC actively concealed its bias from its own donors as well as donors to the campaigns of Clinton’s rivals, including Bernie Sanders (“Sanders”).

131. The truth of the DNC’s deception started to come to public light in June 2016.

132. On June 14, 2016, officials of the DNC announced that Russian government hackers had penetrated its computer network. The hackers had access to the network for approximately one year. According to the Washington Post, “[t]he intruders so thoroughly compromised the DNC’s system that they also were able to read all email and chat traffic” – but in the same article, “[t]he DNC said that no financial, donor or personal information appears to have been accessed or taken[.]”⁶

⁵ See Tribune news services, “Sanders says he is backing opponent of DNC chair Wasserman Schultz,” **Chicago Tribune** (May 21, 2016), *available at* <http://www.chicagotribune.com/news/nationworld/politics/ct-sanders-dnc-chair-20160521-story.html> (last visited June 20, 2016).

⁶ See Ellen Nakashima, “Russian government hackers penetrated DNC, stole opposition research on Trump,” **The Washington Post** (June 14, 2016), *available at*

[...continued]

133. The same day, CrowdStrike – a network security consulting firm retained by the DNC to investigate and respond to the breach – publicly released more details. According to CrowdStrike, two separate hacker groups affiliated with the Russian government, codenamed “Cozy Bear” and “Fancy Bear,” were detected as having infiltrated the DNC network. Both groups have a long history of successfully targeting sensitive government and industry computer networks in both the United States and other countries, often using “sophisticated phishing attacks.” CrowdStrike concluded that Cozy Bear’s intrusion of the DNC network began in summer of 2015, while Fancy Bear separately breached it in April 2016.⁷

134. On June 15, 2016, an individual using the name “Guccifer 2.0” established a publicly accessible website (<https://guccifer2.wordpress.com>) and posted a statement taking credit for the DNC server hack.⁸ Below the statement, Guccifer 2.0 posted a series of documents purportedly taken from the DNC’s servers including: (a) a 281-page confidential “Donald Trump Report” purportedly submitted to the DNC on 12/19/15 and containing extensive research on the presumptive Republican presidential nominee; (b) Excel spreadsheets containing the names and personal information of donors to the Democratic Party and Hillary Clinton’s campaign; and (c)

https://www.washingtonpost.com/world/national-security/russian-government-hackers-penetrated-dnc-stole-opposition-research-on-trump/2016/06/14/cf006cb4-316e-11e6-8ff7-7b6c1998b7a0_story.html (last visited June 23, 2016).

⁷ See Dmitri Alperovitch, “Bears in the Midst: Intrusion into the Democratic National Committee,” **CrowdStrike Blog** (June 14, 2016, updated June 15, 2016), *available at* <https://www.crowdstrike.com/blog/bears-midst-intrusion-democratic-national-committee/> (last visited June 23, 2016); Michael Kan, “Russian hackers breach DNC computers, steal data on Donald Trump,” **PCWorld** (June 14, 2016), *available at* <http://www.pcworld.com/article/3083440/security/russian-hackers-breach-dnc-computers-steal-data-on-trump.html> (last visited June 23, 2016).

⁸ See Ellen Nakashima, “‘Guccifer 2.0’ claims credit for DNC hack,” **The Washington Post** (June 15, 2016), *available at* https://www.washingtonpost.com/world/national-security/guccifer-20-claims-credit-for-dnc-hack/2016/06/15/abdcdf48-3366-11e6-8ff7-7b6c1998b7a0_story.html (last visited June 23, 2016).

a 59-page memorandum marked “Secret” setting forth national security and foreign policy “promises and proposals” and purportedly obtained from Clinton’s personal computer.⁹

135. Among the documents released by Guccifer 2.0 on June 15th is a two-page Microsoft Word file with a “Confidential” watermark that appears to be a memorandum written to the Democratic National Committee regarding “2016 GOP presidential candidates” and dated May 26, 2015. A true and correct copy of this document (hereinafter, “DNC Memo”) is attached as **Exhibit 1**.¹⁰

136. The DNC Memo presents, “a suggested strategy for positioning and public messaging around the 2016 Republican presidential field.” It states that, “Our goals in the coming months will be to frame the Republican field and the eventual nominee early and to *provide a contrast between the GOP field and HRC.*¹¹” (emphasis added). The DNC Memo also advises that the DNC, “[u]se specific hits to muddy the waters around ethics, transparency and campaign finance attacks on HRC.” In order to “muddy the waters” around Clinton’s perceived vulnerabilities, the DNC Memo suggests “several different methods” of attack including: (a) “[w]orking through the DNC” to “utilize reporters” and create stories in the media “with no fingerprints”; (b) “prep[ping]” reporters for interviews with GOP candidates and having

⁹ Guccifer 2.0, “DNC’s Servers Hacked By A Lone Hacker,” *available at* <https://guccifer2.wordpress.com/2016/06/15/dnc/> (last visited June 23, 2016).

¹⁰ Despite being asked the question repeatedly, the DNC has never confirmed or denied the authenticity of any of the documents released by Guccifer 2.0. *See* Reno Berkeley, “DNC Tight-Lipped About Authenticity Of Documents From Guccifer 2.0 Hack,” **Inquisitr** (June 17, 2016), *available at* <http://www.inquisitr.com/3212344/dnc-tight-lipped-about-authenticity-of-documents-from-guccifer-2-0-hack/> (last visited June 24, 2016).

¹¹ “HRC” is short for Hillary Rodham Clinton.

off-the-record conversations with them; (c) making use of social media attacks; and (d) using the DNC to “insert our messaging” into Republican-favorable press.

137. By the date of the DNC Memo, the Democratic presidential nomination field already included, in addition to Clinton, Bernie Sanders, who announced his candidacy on April 30, 2015.¹² And at the time, there was also widespread speculation that others would soon enter the primary race including Joe Biden, Lincoln Chafee, Martin O’Malley, Elizabeth Warren, and Jim Webb.¹³

138. Despite there being every indication that the 2016 Democratic primary would be contested by multiple candidates, including Sanders, the DNC Memo makes no mention of any Democratic candidate except Clinton, and builds the DNC’s election strategy on the assumption that Clinton will be the nominee, with no doubts attached. Rather than reflecting an “impartial” or “evenhanded” approach to the nominating process, as required by the Charter, the DNC Memo strongly indicates that the DNC’s entire approach to the process was guided by the singular goal of elevating Clinton to the general election contest.

139. On June 18 and 21, 2016, Guccifer 2.0 released additional files purportedly taken from the DNC’s servers. Among these documents are even more items that appear to be of a highly sensitive nature including: (a) multiple spreadsheets of donors to the DNC and other organizations, including the Clinton Foundation, containing personal information such as names, email addresses, and phone numbers; (b) a “private and confidential” memorandum to Secretary

¹² See Dan Merica, “Bernie Sanders is running for president,” **CNN Politics** (Apr. 30, 2015), available at <http://www.cnn.com/2015/04/29/politics/bernie-sanders-announces-presidential-run/> (last visited June 23, 2016).

¹³ See Newsday.com with the Associated Press, “2016 presidential race: Possible Democratic candidates,” **Newsday** (Apr. 29, 2015), available at <http://www.newsday.com/news/nation/democrats-who-may-run-for-president-in-2016-from-clinton-to-biden-1.9988978> (last visited June 23, 2016). Of these, only Joe Biden and Elizabeth Warren ultimately decided not to run.

of Defense Ashton Carter from a senior advisor regarding appointments to the Joint Chiefs of Staff; (c) fee, travel, and lodging requirements for Clinton's paid speeches; (d) Clinton's tax returns; and (e) thousands of pages of research, apparently prepared by DNC staff as well as Clinton's campaign staff, relating to Clinton's candidacy including her "vulnerabilities," potential attacks, rebuttals, policy positions, and opposition research on the other Democratic candidates.¹⁴

140. These additional files entail further, substantial evidence that the DNC was anything but "impartial," "evenhanded," or "neutral" with respect to the Democratic nominating process. To the contrary, and in spite of the governing Charter and its multiple public statements, the DNC devoted its resources to propelling Clinton's candidacy ahead of all of her rivals, even if this meant working directly against the interests of Democratic Party members, including Bernie Sanders' supporters.

141. All conditions precedent to the commencement and prosecution to final judgment of this civil action have taken place, have been performed, or have been waived or excused by Defendants.

142. Plaintiffs have been compelled to engage the services of the undersigned attorneys and to pay them a reasonable fee.

¹⁴ See "DNC Researched Clinton Speeches, Travel Records," **The Smoking Gun** (June 21, 2016), available at <http://www.thesmokinggun.com/documents/crime/dnc-researched-clinton-speeches-travel-records-621985> (last visited June 24, 2016); Salam Marcos, "Guccifer 2.0: 'Neutral' DNC Staff Conducted Research for Clinton," **Progressive Army**, (June 21, 2016) available at <http://progressivearmy.com/2016/06/21/guccifer-2-0-dnc-conducted-research-clinton/> (last visited June 24, 2016); Stephen K. Bannon & Alexander Marlow, "Secret Memo: 42-Page Leaked DNC Document Reveals Clinton Foundation Scandal 'Vulnerabilities' For Hillary Clinton," **Breitbart** (June 21, 2016), available at <http://www.breitbart.com/2016-presidential-race/2016/06/21/secret-memo-42-page-leaked-dnc-document-reveals-clinton-foundation-scandal-vulnerabilities-hillary-clinton/> (June 24, 2016).

CLASS ACTION ALLEGATION

143. Plaintiffs bring this lawsuit on behalf of themselves and the proposed class members under Rules 23(b)(1), (b)(2), and (b)(3) of the Federal Rules of Civil Procedure, as noted below.

144. There are three proposed classes (hereinafter collectively referred to as the “Classes”):

- a) All people or entities who have contributed to the DNC from January 1, 2015 through the date of this action (“DNC Donor Class”);
- b) All people or entities who have contributed to the Bernie Sanders campaign from January 1, 2015 through the date of this action (“Sanders Donor Class”); and
- c) All registered members of the Democratic Party (“Democratic Party Class”).¹⁵

145. Plaintiffs, Cork, Young, S. Lynch, S. Davis, Berners-Lee, Criddle, and Dreis-Ornelas bring this action on behalf of themselves and the DNC Donor Class. Hereinafter, they will be referred to collectively as the “DNC Donor Class Plaintiffs.”

146. Plaintiffs, Wilding, Rifken, Crawford, Franz, Pulaski, Welch, J. Gonzalez, Plattner, Houle, Bingen, S. Reed, Monson, Coleman, Snyder, M. Shaw, Haney, E. Gonzalez, Cyko, Genna, Blair, Johnston, Resch, Teegardin, O’Meara, Lew, Reynolds, Smith, Primack, Cassidy, Musick, Bierhoff, Taylor, Singer, Braund, Hale, W. Crandall, Hurst, Weiss, Anderson,

¹⁵ Specifically excluded from the class definitions are Defendants; the officers, directors, or employees of Defendants; any entity in which Defendants have a controlling interest; and any affiliate, legal representative, heir, or assign of Defendants. Also excluded are any federal, state, or local governmental entities, any judicial officer presiding over this action and the members of his/her immediate family and judicial staff, and any juror assigned to this action.

Witkowski, Figueroa, Kincaid, Alberts, Roderick, Vaughn, T. Sparks, Gale, Deitch-Coulter, Ashcraft, A. Davis, Ronzani, Grim, Consiglio, Lugo, Dade, M. Reed, R. Crandall, Conant, Ghan, Settle, Y. Cooper, D. Cooper, Brady, Rousseau, Catterall, Hampton, Bubba, Furreboe, Z. Shaw, Ilarraza, Grooms, Maiurano, Humiston, J. Lynch, Simon, Bates, Goldberg, Washik, Booker, Cole, E. Sparks, Gopalakrishnan, Villamar, Jacobson, Dudley, Meneely, Buschini, Maxwell, Meuli, Puckett, Pyles, Chan, Birdsong, Knowlton, Johann, Rogers, Jordan, Kangas-Kent, Frisbie, Inamov, Larson-Wright, Hoffman, Grudin, and Busto bring this action on behalf of themselves and the Sanders Donor Class. Hereinafter, they will be referred to collectively as the “Sanders Donor Class Plaintiffs.”

147. Plaintiffs, Liang, Gleason, Mickey, Dreyfus, Dodge, Willott, Burgener, Janis, and Ferragut bring this action on behalf of themselves and the Democratic Party Class. Hereinafter, they will be referred to collectively as the “Democratic Party Class Plaintiffs.”

148. **Numerosity.** The members of each of the Classes are so numerous that their individual joinder is impracticable.

149. **Existence and Predominance of Common Questions of Law and Fact.** Common questions of law and fact exist as to all members of the Classes and predominate over any questions affecting only individual members of the Classes.

150. **Typicality.** Plaintiffs’ claims are typical of the claims of the members of the Classes they seek to represent, and Plaintiffs have the same claims as those of the other class members they seek to represent.

151. **Adequacy of Representation.** Plaintiffs will fairly and adequately protect the interests of the members of their respective Classes. Plaintiffs have retained counsel highly

experienced in class action litigation, and Plaintiffs intend to prosecute this action vigorously. Plaintiffs have no adverse or antagonistic interests to those of the Classes.

152. The prosecution of separate actions by individual members of the Classes would create a risk of inconsistent or varying adjudications with respect to individual members of the Classes which would establish incompatible standards of conduct for the parties opposing the Classes.

153. Defendants acted on grounds generally applicable to the Classes with respect to the matters complained of herein, thereby making appropriate the relief sought herein with respect to each of the Classes as a whole.

CAUSES OF ACTION

COUNT I

(Fraud)

(DNC Donor Class & Sanders Donor Class)

154. The DNC Donor Class Plaintiffs and the Sanders Donor Class Plaintiffs re-allege paragraphs 1 through 153 above as if fully set forth herein.

155. Defendants knowingly made false statements and omissions concerning material facts.

156. Defendants intended that the false statements and omissions would induce the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, to rely on them.

157. The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, relied on Defendants' false statements and omissions to their injury.

158. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

159. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class.

COUNT II

(Negligent Misrepresentation) (DNC Donor Class & Sanders Donor Class)

160. The DNC Donor Class Plaintiffs and the Sanders Donor Class Plaintiffs re-allege paragraphs 1 through 153 above as if fully set forth herein.

161. Defendants made misrepresentations and omissions concerning material facts.

162. At the time of the misrepresentations and omissions, Defendants either knew them to be false, made them without knowledge of the truth or falsity, or should have known them to be false.

163. Defendants intended that the misrepresentations and omissions would induce the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, to rely on them.

164. The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, justifiably relied on Defendants' misrepresentations and omissions to their injury.

165. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

166. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class and members of the DNC Donor Class and Sanders Donor Class.

COUNT III

(Violation of § 28-3904 of the D.C. Code) (DNC Donor Class & Sanders Donor Class)

167. The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class re-allege paragraphs 1 through 153 above as if fully set forth herein.

168. For purposes of the allegations in this complaint, the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, are "consumers" pursuant to subsection 28-3901(a)(2) of the District of Columbia Code.

169. For purposes of the allegations in this complaint, Defendants are "persons" pursuant to subsection 28-3901(a)(1) of the District of Columbia Code.

170. Defendants misrepresented as to material facts that had a tendency to mislead the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class.

171. Defendants failed to state material facts, and such failure tended to mislead the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class.

172. As such, Defendants violated subsections 28-3904(e) and 28-3904(f) of the District of Columbia Code.

173. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

174. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class.

COUNT IV

(Unjust Enrichment) (DNC Donor Class)

175. The DNC Donor Class Plaintiffs re-allege paragraphs 1 through 153 above as if fully set forth herein.

176. The DNC Donor Class Plaintiffs and members of the DNC Donor Class conferred benefits on the Defendants, who had knowledge thereof.

177. Defendants voluntarily accepted and retained the benefits conferred.

178. The circumstances are such that it would be inequitable for the Defendants to retain the benefits without paying the value thereof to the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

179. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the DNC Donor Class Plaintiffs and members of the DNC Donor Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

180. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

COUNT V

(Breach of Fiduciary Duty) (Democratic Party Class)

181. The Democratic Party Class Plaintiffs re-allege paragraphs 1 through 153 above as if fully set forth herein.

182. Defendants had a fiduciary duty to the Democratic Party Class Plaintiffs and members of the Democratic Party Class.

183. Defendants breached their fiduciary duty to the Democratic Party Class Plaintiffs and members of the Democratic Party Class.

184. The Democratic Party Class Plaintiffs and members of the Democratic Party Class have been proximately damaged by Defendants' breach.

185. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the Democratic Party Class Plaintiffs and members of the Democratic Party Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

186. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of the Democratic Party Class Plaintiffs and members of the Democratic Party Class.

COUNT VI

**(Negligence)
(DNC Donor Class)**

187. The DNC Donor Class Plaintiffs as re-allege paragraphs 1 through 153 above as if fully set forth herein.

188. Defendants owed a duty to the DNC Donor Class Plaintiffs and members of the DNC Donor Class to use and exercise reasonable and due care in obtaining, retaining, and securing the personal and financial information provided to them in connection with their contributions to the DNC.

189. Defendants owed a duty to the DNC Donor Class Plaintiffs and members of the DNC Donor Class to provide security, consistent with industry standards and requirements, to ensure that the DNC's computer systems and networks, and the personnel responsible for them, adequately protected the personal and financial information of the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

190. Defendants owed a duty of care to the DNC Donor Class Plaintiffs and members of the DNC Donor Class because they were a foreseeable and probable victim of any inadequate data security practices. Defendants solicited, gathered, and stored the sensitive financial and personal data provided by the DNC Donor Class Plaintiffs and members of the DNC Donor Class to facilitate their contributions. Defendants knew they inadequately safeguarded this information on the DNC computer systems and that sophisticated hackers routinely attempted to access this valuable data without authorization. Defendants knew that a breach of the system

would inflict considerable damages upon the DNC Donor Class Plaintiffs and members of the DNC Donor Class, and Defendants were therefore charged with a duty to adequately protect this critically sensitive information.

191. Defendants maintained a special relationship with the DNC Donor Class Plaintiffs and members of the DNC Donor Class. The DNC Donor Class Plaintiffs and members of the DNC Donor Class entrusted Defendants with their personal and financial information on the assumption that Defendants would safeguard this information, and Defendants were in a position to protect against the harm suffered by the DNC Donor Class Plaintiffs and members of the DNC Donor Class as a result of the network breaches.

192. In light of their special relationship with the DNC Donor Class Plaintiffs and members of the DNC Donor Class, Defendants knew, or should have known, of the risks inherent in collecting and storing the personal and financial information of the DNC Donor Class Plaintiffs and members of the DNC Donor Class, and the importance of providing adequate security of that information.

193. Defendants breached the duties they owed to the DNC Donor Class Plaintiffs and members of the DNC Donor Class by failing to exercise reasonable care and implement adequate security protocols – including protocols consistent with industry standards – sufficient to protect the personal and financial information of the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

194. Defendants breached the duties they owed to the DNC Donor Class Plaintiffs and members of the DNC Donor Class by failing to properly implement technical systems or security practices that could have prevented the theft of the information at issue.

195. Defendants breached the duties they owed to the DNC Donor Class Plaintiffs and members of the DNC Donor Class by failing to properly maintain the sensitive personal and financial information of the DNC Donor Class Plaintiffs and members of the DNC Donor Class. Given the risk involved and the amount of data at issue, Defendants breach of their duties was entirely unreasonable.

196. As a direct and proximate result of Defendants' negligent conduct, the DNC Donor Class Plaintiffs and members of the DNC Donor Class have suffered injury and are entitled to damages in an amount to be proven at trial.

197. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the safety and rights of the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for a judgment:

198. For declaratory and injunctive relief declaring illegal and enjoining, preliminarily and permanently, Defendants' violation of and failure to follow the Charter and Bylaws of the Democratic Party;

199. Certification of this action as a class action, designation of Plaintiffs as class representatives and undersigned counsel as class counsel;

200. For compensatory, general, restitutionary, restorative, statutory, treble, and special damages for Plaintiffs against Defendants;

201. Exemplary/punitive damages as against Defendants in an amount sufficient to deter and to make an example of Defendants;

202. Attorneys' fees and costs;

- 203. Prejudgment and post-judgment interest; and
- 204. The cost of this suit and such other relief as the court finds just and proper.

JURY DEMAND

- 205. Plaintiffs demand a jury trial on all issues so triable.

DATED: June 28, 2016

RESPECTFULLY SUBMITTED,

/s/ Jared H. Beck

By: Jared H. Beck

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Counsel for Plaintiffs and the Proposed Classes

TAB/DOCKET NO.

1-1

Exhibit 1

To: The Democratic National Committee
Re: 2016 GOP presidential candidates
Date: May 26, 2015

Below, please find a suggested strategy for positioning and public messaging around the 2016 Republican presidential field. Ultimately, we need to

Our Goals& Strategy

Our goals in the coming months will be to frame the Republican field and the eventual nominee early and to provide a contrast between the GOP field and HRC. Over the long-term, these efforts will be aimed at getting us the best match-up in the general election, and weakening the eventual nominee through the course of the primary. We have outlined three strategies to obtain our goal:

- 1) Highlight when GOP candidates are outside of the mainstream on key issues, ideally driving the rest of the field to follow with positions that will hurt them in a general election;
- 2) Damage Republican presidential candidates' credibility with voters by looking for targeted opportunities to undermine their specific messaging;
- 3) Use specific hits to muddy the waters around ethics, transparency and campaign finance attacks on HRC

Operationalizing the Strategy

Highlighting Extreme or Unpopular Positions

There are two ways to approach the strategies mentioned above. The first is to use the field as a whole to inflict damage on itself similar to what happened to Mitt Romney in 2012. The variety and volume of candidates is a positive here, and many of the lesser known can serve as a cudgel to move the more established candidates further to the right. In this scenario, we don't want to marginalize the more extreme candidates, but make them more "Pied Piper" candidates who actually represent the mainstream of the Republican Party. In these issues, we would elevate statements and policies from any candidate—including second and third-tier candidates—on issues that will make them seem too far to the right on social issues and too far from the priorities of everyday Americans on economic issues.

Undermining Their Message& Credibility, Based on our General Election Priorities

In addition to pinning down the field on key issues, we will work to undermine the Republican candidate's specific messaging, while keeping in mind which candidates and which messages we believe are most powerful. These messages and the responses to them will change given new campaign positioning and new learnings from polling and research, but on these issues, we will keep the focus on the most likely candidates to allow some possibility for growth with the weaker candidates.

- Jeb Bush
 - What to undermine: the notion he is a "moderate" or concerned about regular Americans; perceived inroads with the Latino population.
- Marco Rubio

- What to undermine: the idea he has “fresh” ideas; his perceived appeal to Latinos and younger voters
- Scott Walker
 - What to undermine: his Wisconsin record, particularly on jobs; the idea he can rally working- and middle class Americans.
- Rand Paul
 - What to undermine: the idea he is a “different” kind of Republican; his stance on the military and his appeal to millennials and communities of color.
- Chris Christie
 - What to undermine: his success as governor, his hypocrisy in telling it like it is vs. his ethical issues and acts of a typical politician.

Muddying the Waters

As we all know, the right wing attack machine has been building its opposition research on Hillary Clinton for decades. HRC's critics have been telegraphing they are ready to attack and do so with reckless abandon. While reporters have much less of an appetite for ethics stories about GOP candidates, we will utilize the research to place highly targeted hits—for example, GOP candidates taking positions supported by their major super PAC donors.

Tactics

Working with the DNC and allied groups, we will use several different methods to land these attacks, including:

- **Reporter Outreach:** Working through the DNC and others, we should use background briefings, prep with reporters for interviews with GOP candidates, off-the-record conversations and oppo pitches to help pitch stories with no fingerprints and utilize reporters to drive a message.
- **Releases and Social Media:** Where appropriate these attacks can be leveraged for more public release, particularly the attacks around specific issues where a public release can point out that Republicans are outside of the mainstream.
- **Bracketing Events:** Both the DNC and outside groups are looking to do events and press surrounding Republican events to insert our messaging into their press and to force them to answer questions around key issues.

We look forward to discussing this strategy further. Our goal is to use this conversation to answer the questions who do we want to run against and how best to leverage other candidates to maneuver them into the right place.

TAB/DOCKET NO.

8

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

FORT LAUDERDALE DIVISION

CASE NO. 16-cv-61511-WJZ

CAROL WILDING; STANLEY RIFKEN;
SHARON CRAWFORD; WILLIAM SCOTT
FRANZ; DAVID PULASKI; MARY
JASMINE WELCH; JOSE ALBERTO
GONZALEZ; JANE ELLEN PLATTNER;
KIM MARIE HOULE; TIMOTHY BINGEN;
SUSAN REED; ANGELA MONSON;
AIMEE R. COLEMAN; ELESHA SNYDER;
MATTHEW SHAW; ZACHARY JAMES
HANEY; ESTRELLA GONZALEZ;
CATHERINE G. CYKO; LAURA GENNA;
MARIANNE BLAIR; TAMARA L.
JOHNSTON; VALERIE ELYSE RASCH;
BRETT TEEGARDIN; DANIEL O'MEARA;
PEGGY LEW; DANIEL J. REYNOLDS;
BRENDA LEE SMITH; MARLOWE ST.
CLOUD PRIMACK; PATRICIA D.
CASSIDY; BRITTANY R. MUSICK;
HARRIS BIERHOFF; FELICIA MICHELLE
TAYLOR; SUSAN L. SINGER; KYLE G.
BRAUND; LAUREN HALE; WILLIAM
CRANDALL; KIRSTEN HURST; DUFFY
ROBERT WEISS; CONNIE ANDERSON;
GREGORY WITKOWSKI; ELIZABETH
FIGUEROA; BRANDY KINCAID;
KIMBERLY ALBERTS; RACHEL
RODERICK; LAURA MICHELLE
VAUGHN; LISA GALE; TAMMY DEITCH-
COULTER; KAYITE ASHCRAFT; ALECIA
R. DAVIS; DOMINIC RONZANI; LUKE
GRIM; ROSALIE CONSIGLIO; EDWIN
LUGO; HEATHER DADE; MICHAEL S.
REED; RHIANNON CRANDALL; RYAN
GHAN; LISA SETTLE; YALONDA DYE
COOPER; DANIEL S. COOPER;
MATTHEW JOSEPH BRADY; ANDREW
ROUSSEAU; SUSAN CATTERALL; JULIE

FIRST AMENDED COMPLAINT –

CLASS ACTION

DEMAND FOR JURY TRIAL

HAMPTON; CHRIS BUBB; ERIK FURREBOE; ZEKE SHAW; BENJAMIN ILARRAZA; LUCILLE GROOMS; CHRISTINE MAIURANO; LEWIS L. HUMISTON, IV; JOHN LYNCH; JAMES SIMON; LESTER JOHN BATES, III; JEFFREY GOLDBERG; RICK WASHIK; RICHARD BOOKER; KARLIE COLE; ERICH SPARKS; PRABU GOPALAKRISHNAN; CARLOS VILLAMAR; CAROLYN JACOBSON; DAN ELLIS DUDLEY; LISA ANNE MENEELY; D.J. BUSCHINI; RAYMOND D. MAXWELL; DAVID L. MEULI; KENNETH E. PUCKETT; DAVID N. PYLES; CYNTHIA T. CHAN; STEFANIE BIRDSONG; AMBER RAE KNOWLTON; TIMO A. JOHANN; JEFF ROGERS; HEATHER JORDAN; RANA KANGAS-KENT; SUSAN FRISBIE; BAKH INAMOV; THEDA LARSON-WRIGHT; KIRSTEN HOFFMAN; ANTHONY GRUDIN; BRUCE BUSTO; SUZANNE M. CORK; EMMA L. YOUNG; SEAN LYNCH; SHERRY DAVIS; NANCY BERNERS-LEE; PHYLLIS CRIDDLE; MELISSA LIANG; JOSEPH GLEASON; GRETA MICKEY; DIANE EMILY DREYFUS; KATHLEEN L. DODGE; CATHERINE WILLOTT; TRISTAN BURGNER; ERIK MICHAEL FERRAGUT; VINCENT CAUCHI; JOSEPH CALLAN; MARK BEDARD; BARBARA BOWEN; STEVE PHILIPP; SUSAN PHILLIPS; RICHARD J. BOYLAN; TERI MONACO; TUKOI JARRETT; ANNMARIE WILSON; ANDREW ORRINO; CRAIG CURRIER; JARATH HEMPHILL; GEORGE THOMAS; REBECCA WHITE-HAYES; ALAINA TALBOY; SARAH LOPEZ; ELIZA FEERO; REBECCA HOHM; GAYLE A. HARROD; ERIKA SITZER; STEPHEN HOUSEKNECHT; DIANE ROBINSON; JEN BETTERLEY; AMALIE DUVALL; JOHN CROWE; CARL MILLER; SUSAN ROPPEL; DIANA FLORES; JULIANNA SEYMOUR; MELISSA MARCOTTE;

DANIELLE INGRASSIA; ALETTE PRICHETT; and TORSHA CHILDS, individually, and on behalf of all those similarly situated,

Plaintiffs,

vs.

DNC SERVICES CORPORATION, d/b/a DEMOCRATIC NATIONAL COMMITTEE; and DEBORAH "DEBBIE" WASSERMAN SCHULTZ,

Defendants.

PLAINTIFFS CAROL WILDING; STANLEY RIFKEN; SHARON CRAWFORD; WILLIAM SCOTT FRANZ; DAVID PULASKI; MARY JASMINE WELCH; JOSE ALBERTO GONZALEZ; JANE ELLEN PLATTNER; KIM MARIE HOULE; TIMOTHY BINGEN; SUSAN REED; ANGELA MONSON; AIMEE R. COLEMAN; ELESHA SNYDER; MATTHEW SHAW; ZACHARY JAMES HANEY; ESTRELLA GONZALEZ; CATHERINE G. CYKO; LAURA GENNA; MARIANNE BLAIR; TAMARA L. JOHNSTON; VALERIE ELYSE RASCH; BRETT TEEGARDIN; DANIEL O'MEARA; PEGGY LEW; DANIEL J. REYNOLDS; BRENDA LEE SMITH; MARLOWE ST. CLOUD PRIMACK; PATRICIA D. CASSIDY; BRITTANY R. MUSICK; HARRIS BIERHOFF; FELICIA MICHELLE TAYLOR; SUSAN L. SINGER; KYLE G. BRAUND; LAUREN HALE; WILLIAM CRANDALL; KIRSTEN HURST; DUFFY ROBERT WEISS; CONNIE ANDERSON; GREGORY WITKOWSKI; ELIZABETH FIGUEROA; BRANDY KINCAID; KIMBERLY ALBERTS; RACHEL RODERICK; LAURA MICHELLE VAUGHN; LISA GALE; TAMMY DEITCH-COULTER; KAYITE ASHCRAFT; ALECIA R. DAVIS; DOMINIC RONZANI; LUKE GRIM; ROSALIE CONSIGLIO; EDWIN LUGO; HEATHER DADE; MICHAEL S. REED;

RHIANNON CRANDALL; RYAN GHAN; LISA SETTLE; YALONDA DYE COOPER;
DANIEL S. COOPER; MATTHEW JOSEPH BRADY; ANDREW ROUSSEAU; SUSAN
CATTERALL; JULIE HAMPTON; CHRIS BUBB; ERIK FURREBOE; ZEKE SHAW;
BENJAMIN ILARRAZA; LUCILLE GROOMS; CHRISTINE MAIURANO; LEWIS L.
HUMISTON, IV; JOHN LYNCH; JAMES SIMON; LESTER JOHN BATES, III; JEFFREY
GOLDBERG; RICK WASHIK; RICHARD BOOKER; KARLIE COLE; ERICH SPARKS;
PRABU GOPALAKRISHNAN; CARLOS VILLAMAR; CAROLYN JACOBSON; DAN
ELLIS DUDLEY; LISA ANNE MENEELY; D.J. BUSCHINI; RAYMOND D. MAXWELL;
DAVID L. MEULI; KENNETH E. PUCKETT; DAVID N. PYLES; CYNTHIA T. CHAN;
STEFANIE BIRDSONG; AMBER RAE KNOWLTON; TIMO A. JOHANN; JEFF ROGERS;
HEATHER JORDAN; RANA KANGAS-KENT; SUSAN FRISBIE; BAKH INAMOV;
THEDA LARSON-WRIGHT; KIRSTEN HOFFMAN; ANTHONY GRUDIN; BRUCE BUSTO;
SUZANNE M. CORK; EMMA L. YOUNG; SEAN LYNCH; SHERRY DAVIS; NANCY
BERNERS-LEE; PHYLLIS CRIDDLE; MELISSA LIANG; JOSEPH GLEASON; GRETA
MICKEY; DIANE EMILY DREYFUS; KATHLEEN L. DODGE; CATHERINE WILLOTT;
TRISTAN BURGNER; ERIK MICHAEL FERRAGUT; VINCENT CAUCHI; JOSEPH
CALLAN; MARK BEDARD; BARBARA BOWEN; STEVE PHILIPP; SUSAN PHILLIPS;
RICHARD J. BOYLAN; TERI MONACO; TUKOI JARRETT; ANNMARIE WILSON;
ANDREW ORRINO; CRAIG CURRIER; JARATH HEMPHILL; GEORGE THOMAS;
REBECCA WHITE-HAYES; ALAINA TALBOY; SARAH LOPEZ; ELIZA FEERO;
REBECCA HOHM; GAYLE A. HARROD; ERIKA SITZER; STEPHEN HOUSEKNECHT;
DIANE ROBINSON; JEN BETTERLEY; AMALIE DUVALL; JOHN CROWE; CARL
MILLER; SUSAN ROPPEL; DIANA FLORES; JULIANNA SEYMOUR; MELISSA

MARCOTTE; DANIELLE INGRASSIA; ALETTE PRICHETT; and TORSHA CHILDS (collectively, “Plaintiffs”), individually and on behalf of all those similarly situated, by and through undersigned counsel, hereby sue Defendants, DNC SERVICES CORPORATION d/b/a DEMOCRATIC NATIONAL COMMITTEE and DEBORAH “DEBBIE” WASSERMAN SCHULTZ (collectively, “Defendants”), and allege the following:

JURISDICTION AND VENUE

1. This Court has original jurisdiction over the claims asserted herein individually and on behalf of the class pursuant to 28 U.S.C. §1332(d), as amended in February 2005 by the Class Action Fairness Act. Alternatively, this Court has original jurisdiction under 28 U.S.C. §1332(a). Subject matter jurisdiction is proper because: (1) the amount in controversy in this class action exceeds five million dollars, exclusive of interest and costs; and (2) a substantial number of the members of the proposed classes are citizens of a state different from that of Defendants. Personal jurisdiction is proper as both Defendants have purposefully availed themselves of the privilege of conducting business activities within this District, and Defendant, Deborah “Debbie” Wasserman Schultz resides in and is a Congresswoman representing portions of this District. Venue is proper in this judicial district under 28 U.S.C. §1391(b)(1) because both Defendants are deemed to reside in this District and under 28 U.S.C. §1391(b)(2) because both Defendants conduct business in this District and a substantial part of the acts or omissions giving rise to the claims set forth herein occurred in this District.

THE PARTIES AND CERTAIN RELEVANT NON-PARTIES

Plaintiffs

2. Plaintiff Carol Wilding (“Wilding”) is a resident of Pompano Beach, Florida. She contributed a total of \$445.50 to Bernie Sanders’ presidential campaign via ActBlue.

3. Plaintiff Stanley Rifken (“Rifken”) is a resident of New York, New York. He contributed a total of \$552.00 to Bernie Sanders’ presidential campaign via ActBlue.

4. Plaintiff Sharon Crawford (“Crawford”) is a resident of Ashville, North Carolina. She contributed a total of \$600.00 to Bernie Sanders’ presidential campaign via ActBlue.

5. Plaintiff William Scott Franz (“Franz”) is a resident of Costa Mesa, California. He contributed a total of \$2,447.00 to Bernie Sanders’ presidential campaign via ActBlue.

6. Plaintiff David Pulaski (“Pulaski”) is a resident of Houston, Texas. He contributed a total of \$254.10 to Bernie Sanders’ presidential campaign via ActBlue.

7. Plaintiff Mary Jasmine Welch (“Welch”) is a resident of Portland, Oregon. She contributed a total of \$2,447.00 to Bernie Sanders’ presidential campaign via ActBlue.

8. Plaintiff Jose Alberto Gonzalez (“J. Gonzalez”) is a resident of Pharr, Texas. He contributed a total of \$25.00 to Bernie Sanders’ presidential campaign via ActBlue.

9. Plaintiff Jane Ellen Plattner (“Plattner”) is a resident of Golden, Colorado. She contributed a total of \$1,700.00 to Bernie Sanders’ presidential campaign via ActBlue.

10. Plaintiff Kim Marie Houle (“Houle”) is a resident of Brooklyn, Connecticut. She contributed a total of \$445.00 to Bernie Sanders’ presidential campaign via ActBlue.

11. Plaintiff Timothy Bingen (“Bingen”) is a resident of Minot, North Dakota. He contributed a total of \$379.00 to Bernie Sanders’ presidential campaign via ActBlue.

12. Plaintiff Susan Reed (“S. Reed”) is a resident of Rockville, Maryland. She contributed a total of \$1,289.00 to Bernie Sanders’ presidential campaign via ActBlue.

13. Plaintiff Angela Monson (“Monson”) is a resident of Dassel, Minnesota. She contributed a total of \$350.00 to Bernie Sanders’ presidential campaign via ActBlue.

14. Plaintiff Aimee R. Coleman (“Coleman”) is a resident of Chattanooga, Tennessee. She contributed a total of \$2,544.13 to Bernie Sanders’ presidential campaign via ActBlue.

15. Plaintiff Elesha Snyder (“Snyder”) is a resident of Dayton, Ohio. She contributed a total of \$365.50 to Bernie Sanders’ presidential campaign via ActBlue.

16. Plaintiff Matthew Shaw (“M. Shaw”) is a resident of Leawood, Kansas. He contributed a total of \$222.00 to Bernie Sanders’ presidential campaign via ActBlue.

17. Plaintiff Zachary James Haney (“Haney”) is a resident of Roxbury, Massachusetts. He contributed a total of \$91.50 to Bernie Sanders’ presidential campaign via ActBlue.

18. Plaintiff Estrella Gonzalez (“E. Gonzalez”) is a resident of Fostoria, Ohio. She contributed a total of \$5.00 to Bernie Sanders’ presidential campaign via ActBlue.

19. Plaintiff Catherine G. Cyko (“Cyko”) is a resident of Aurora, Illinois. She contributed a total of \$1,156.00 to Bernie Sanders’ presidential campaign via ActBlue.

20. Plaintiff Laura Genna (“Genna”) is a resident of Bloomfield, New Jersey. She contributed a total of \$87.80 to Bernie Sanders’ presidential campaign via ActBlue.

21. Plaintiff Marianne Blair (“Blair”) is a resident of Chicago, Illinois. She contributed a total of \$2,669.50 to Bernie Sanders’ presidential campaign via ActBlue.

22. Plaintiff Tamara L. Johnston (“Johnston”) is a resident of Ozark, Missouri. She contributed a total of \$87.00 to Bernie Sanders’ presidential campaign via ActBlue.

23. Plaintiff Valerie Elyse Rasch (“Rasch”) is a resident of Genoa City, Wisconsin. She contributed a total of \$47.00 to Bernie Sanders’ presidential campaign via ActBlue.

24. Plaintiff Brett Teegardin (“Teegardin”) is a resident of Woodinville, Washington. He contributed a total of \$192.00 to Bernie Sanders’ presidential campaign via ActBlue.

25. Plaintiff Daniel O'Meara ("O'Meara") is a resident of Laconia, New Hampshire. He contributed a total of \$153.00 to Bernie Sanders' presidential campaign via ActBlue.

26. Plaintiff Peggy Lew ("Lew") is a resident of Renton, Washington. She contributed a total of \$480.00 to Bernie Sanders' presidential campaign via ActBlue.

27. Plaintiff Daniel J. Reynolds ("Reynolds") is a resident of Fort Smith, Arkansas. He contributed a total of \$182.81 to Bernie Sanders' presidential campaign via ActBlue.

28. Plaintiff Brenda Lee Smith ("Smith") is a resident of Tallahassee, Florida. She contributed a total of \$4.00 to Bernie Sanders' presidential campaign via ActBlue.

29. Plaintiff Marlowe St. Cloud Primack ("Primack") is a resident of Mountain View, California. She contributed a total of \$1,082.58 to Bernie Sanders' presidential campaign via ActBlue.

30. Plaintiff Patricia D. Cassidy ("Cassidy") is a resident of Blandon, Pennsylvania. She contributed a total of \$1,036.00 to Bernie Sanders' presidential campaign via ActBlue.

31. Plaintiff Brittany R. Musick ("Musick") is a resident of Bremen, Georgia. She contributed a total of \$19.00 to Bernie Sanders' presidential campaign via ActBlue.

32. Plaintiff Harris Bierhoff ("Bierhoff") is a resident of Brentwood, California. He contributed a total of \$215.00 to Bernie Sanders' presidential campaign via ActBlue.

33. Plaintiff Felicia Michelle Taylor ("Taylor") is a resident of West Valley City, Utah. She contributed a total of \$82.00 to Bernie Sanders' presidential campaign via ActBlue.

34. Plaintiff Susan L. Singer ("Singer") is a resident of Niles, Illinois. She contributed a total of \$223.00 to Bernie Sanders' presidential campaign via ActBlue.

35. Plaintiff Kyle G. Braund ("Braund") is a resident of Dadeville, Alabama. He contributed a total of \$54.00 to Bernie Sanders' presidential campaign via ActBlue.

36. Plaintiff Lauren Hale (“Hale”) is a resident of Portland, Maine. She contributed a total of \$35.00 to Bernie Sanders’ presidential campaign via ActBlue.

37. Plaintiff William Crandall (“W. Crandall”) is a resident of Redwood City, California. He contributed a total of \$1,705.34 to Bernie Sanders’ presidential campaign via ActBlue.

38. Plaintiff Kirsten Hurst (“Hurst”) is a resident of Nampa, Idaho. She contributed a total of \$2,447.00 to Bernie Sanders’ presidential campaign via ActBlue.

39. Plaintiff Duffy Robert Weiss (“Weiss”) is a resident of Fargo, North Dakota. He contributed a total of \$121.00 to Bernie Sanders’ presidential campaign via ActBlue.

40. Plaintiff Connie Anderson (“Anderson”) is a resident of Houston, Texas. She contributed a total of approximately \$900.00 to Bernie Sanders’ presidential campaign via ActBlue.

41. Plaintiff Gregory Witkowski (“Witkowski”) is a resident of Highland, New York. He contributed a total of \$445.00 to Bernie Sanders’ presidential campaign via ActBlue.

42. Plaintiff Elizabeth Figueroa (“Figueroa”) is a resident of Los Gatos, California. She contributed a total of \$246.50 to Bernie Sanders’ presidential campaign via ActBlue.

43. Plaintiff Brandy Kincaid (“Kincaid”) is a resident of Clarksville, Tennessee. She contributed a total of \$314.24 to Bernie Sanders’ presidential campaign via ActBlue.

44. Plaintiff Kimberly Alberts (“Alberts”) is a resident of Pittsburgh, Pennsylvania. She contributed a total of \$24.48 to Bernie Sanders’ presidential campaign via ActBlue.

45. Plaintiff Rachel Roderick (“Roderick”) is a resident of Warwick, Rhode Island. She contributed a total of \$599.15 to Bernie Sanders’ presidential campaign via ActBlue.

46. Plaintiff Laura Michelle Vaughn (“Vaughn”) is a resident of Juneau, Alaska. She contributed a total of \$238.80 to Bernie Sanders’ presidential campaign via ActBlue.

47. Plaintiff Lisa Gale (“Gale”) is a resident of Hendersonville, North Carolina. She contributed a total of \$730.37 to Bernie Sanders’ presidential campaign via ActBlue.

48. Plaintiff Tammy Deitch-Coulter (“Deitch-Coulter”) is a resident of Lapeer, Michigan. She contributed a total of \$228.00 to Bernie Sanders’ presidential campaign via ActBlue.

49. Plaintiff Kayite Ashcraft (“Ashcraft”) is a resident of Charlottesville, Virginia. He contributed a total of \$2,447.00 to Bernie Sanders’ presidential campaign via ActBlue.

50. Plaintiff Alecia R. Davis (“A. Davis”) is a resident of Eureka, Montana. She contributed a total of \$531.00 to Bernie Sanders’ presidential campaign via ActBlue.

51. Plaintiff Dominic Ronzani (“Ronzani”) is a resident of Deerfield Beach, Florida. He contributed a total of \$38.54 to Bernie Sanders’ presidential campaign via ActBlue.

52. Plaintiff Luke Grim (“Grim”) is a resident of Harrisburg, Pennsylvania. He contributed a total of \$30.00 to Bernie Sanders’ presidential campaign via ActBlue.

53. Plaintiff Rosalie Consiglio (“Consiglio”) is a resident of Columbia, Maryland. She contributed a total of \$260.00 to Bernie Sanders’ presidential campaign via ActBlue.

54. Plaintiff Edwin Lugo (“Lugo”) is a resident of New York City, New York. He contributed a total of \$53.00 to Bernie Sanders’ presidential campaign via ActBlue.

55. Plaintiff Heather Dade (“Dade”) is a resident of Washington, DC. She contributed a total of \$110.00 to Bernie Sanders’ presidential campaign via ActBlue.

56. Plaintiff Michael S. Reed (“M. Reed”) is a resident of Cheyenne, Wyoming. He contributed a total of \$75.00 to Bernie Sanders’ presidential campaign via ActBlue.

57. Plaintiff Rhiannon Crandall (“R. Crandall”) is a resident of El Paso, Texas. She contributed a total of approximately \$1.00 to Bernie Sanders’ presidential campaign via ActBlue.

58. Plaintiff Ryan Ghan (“Ghan”) is a resident of Reno, Nevada. He contributed a total of \$431.25 to Bernie Sanders’ presidential campaign via ActBlue.

59. Plaintiff Lisa Settle (“Settle”) is a resident of Newport Beach, California. She contributed a total of \$1,255.40 to Bernie Sanders’ presidential campaign via ActBlue.

60. Plaintiff Yalonda Dye Cooper (“Y. Cooper”) is a resident of Flint, Michigan. She contributed a total of 139.00 to Bernie Sanders’ presidential campaign via ActBlue.

61. Plaintiff Daniel S. Cooper (“D. Cooper”) is a resident of Flint, Michigan. He contributed a total of \$110.00 to Bernie Sanders’ presidential campaign via ActBlue.

62. Plaintiff Matthew Joseph Brady (“Brady”) is a resident of Wilmington, Delaware. He contributed a total of \$1,220.00 to Bernie Sanders’ presidential campaign via ActBlue.

63. Plaintiff Andrew Rousseau (“Rousseau”) is a resident of North Hero, Vermont. He contributed a total of \$290.00 to Bernie Sanders’ presidential campaign via ActBlue.

64. Plaintiff Susan Catterall (“Catterall”) is a resident of Hamilton, Indiana. She contributed a total of \$127.00 to Bernie Sanders’ presidential campaign via ActBlue.

65. Plaintiff Julie Hampton (“Hampton”) is a resident of Fairfield, Iowa. She contributed a total of \$277.00 to Bernie Sanders’ presidential campaign via ActBlue.

66. Plaintiff Chris Bubb (“Bubb”) is a resident of Denton, North Carolina. He contributed a total of \$92.39 to Bernie Sanders’ presidential campaign via ActBlue.

67. Plaintiff Erik Furreboe (“Furreboe”) is a resident of Mesa, Arizona. He contributed a total of \$13.00 to Bernie Sanders’ presidential campaign via ActBlue.

68. Plaintiff Zeke Shaw (“Z. Shaw”) is a resident of Acworth, Georgia. He contributed a total of \$3.00 to Bernie Sanders’ presidential campaign via ActBlue.

69. Plaintiff Benjamin Ilarraza (“Ilarraza”) is a resident of Fort Worth, Texas. He contributed a total of \$225.00 to Bernie Sanders’ presidential campaign via ActBlue.

70. Plaintiff Lucille Grooms (“Grooms”) is a resident of Boise, Idaho. She contributed a total of \$284.00 to Bernie Sanders’ presidential campaign via ActBlue.

71. Plaintiff Christine Maiurano (“Maiurano”) is a resident of Gilbertsville, New York. She contributed a total of \$530.50 to Bernie Sanders’ presidential campaign via ActBlue.

72. Plaintiff Lewis L. Humiston, IV (“Humiston”) is a resident of Auburn, Washington. He contributed a total of \$108.00 to Bernie Sanders’ presidential campaign via ActBlue.

73. Plaintiff John Lynch (“J. Lynch”) is a resident of Stuart, Florida. He contributed a total of \$1,349.00 to Bernie Sanders’ presidential campaign via ActBlue.

74. Plaintiff James Simon (“Simon”) is a resident of New York, New York. He contributed a total of \$2,700.00 to Bernie Sanders’ presidential campaign via ActBlue.

75. Plaintiff Lester John Bates, III (“Bates”) is a resident of Kurtistown, Hawaii. He contributed a total of approximately \$390.00 to Bernie Sanders’ presidential campaign via ActBlue.

76. Plaintiff Jeffrey Goldberg (“Goldberg”) is a resident of Cascade, Colorado. He contributed a total of \$82.00 to Bernie Sanders’ presidential campaign via ActBlue.

77. Plaintiff Rick Washik (“Washik”) is a resident of Potsdam, New York. He contributed a total of \$304.20 to Bernie Sanders’ presidential campaign via ActBlue.

78. Plaintiff Richard Booker (“Booker”) is a resident of Hampton, Virginia. He contributed a total of \$228.37 to Bernie Sanders’ presidential campaign via ActBlue.

79. Plaintiff Karlie Cole (“Cole”) is a resident of Minneapolis, Minnesota. She contributed a total of \$226.00 to Bernie Sanders’ presidential campaign via ActBlue.

80. Plaintiff Erich Sparks (“Sparks”) is a resident of Cazenovia, New York. He contributed a total of \$382.80 to Bernie Sanders’ presidential campaign via ActBlue.

81. Plaintiff Prabu Gopalakrishnan (“Gopalakrishnan”) is a resident of Chicago, Illinois. He contributed a total of \$191.00 to Bernie Sanders’ presidential campaign via ActBlue.

82. Plaintiff Carlos Villamar (“Villamar”) is a resident of Falls Church, Virginia. He contributed a total of \$195.00 to Bernie Sanders’ presidential campaign via ActBlue.

83. Plaintiff Carolyn Jacobson (“Jacobson”) is a resident of Pasadena, California. She contributed a total of \$300.00 to Bernie Sanders’ presidential campaign via ActBlue.

84. Plaintiff Dan Ellis Dudley (“Dudley”) is a resident of Douglas, Massachusetts. He contributed a total of \$773.50 to Bernie Sanders’ presidential campaign via ActBlue.

85. Plaintiff Lisa Anne Meneely (“Meneely”) is a resident of Napa, California. She contributed a total of \$105.00 to Bernie Sanders’ presidential campaign via ActBlue.

86. Plaintiff D.J. Buschini (“Buschini”) is a resident of Somerville, Massachusetts. He contributed a total of \$13.00 to Bernie Sanders’ presidential campaign via ActBlue.

87. Plaintiff Raymond D. Maxwell (“Maxwell”) is a resident of Washington, District of Columbia. He contributed a total of \$114.00 to Bernie Sanders’ presidential campaign via ActBlue.

88. Plaintiff David L. Meuli (“Meuli”) is a resident of Fairbanks, Alaska. He contributed a total of \$423.50 to Bernie Sanders’ presidential campaign via ActBlue.

89. Plaintiff Kenneth E. Puckett (“Puckett”) is a resident of Portland, Oregon. He contributed a total of \$1,972.26 to Bernie Sanders’ presidential campaign via ActBlue.

90. Plaintiff David N. Pyles (“Pyles”) is a resident of Nelson, New Hampshire. He contributed a total of \$1,005.50 to Bernie Sanders’ presidential campaign via ActBlue.

91. Plaintiff Cynthia T. Chan (“Chan”) is a resident of Athens, Georgia. She contributed a total of \$111.00 to Bernie Sanders’ presidential campaign via ActBlue.

92. Plaintiff Stefanie Birdsong (“Birdsong”) is a resident of Denver, Colorado. She contributed a total of \$159.00 to Bernie Sanders’ presidential campaign via ActBlue.

93. Plaintiff Amber Rae Knowlton (“Knowlton”) is a resident of Lancaster, Massachusetts. She contributed a total of \$277.50 to Bernie Sanders’ presidential campaign via ActBlue.

94. Plaintiff Timo A. Johann (“Johann”) is a resident of Mebane, North Carolina. He contributed a total of \$35.00 to Bernie Sanders’ presidential campaign via ActBlue.

95. Plaintiff Jeff Rogers (“Rogers”) is a resident of Seattle, Washington. He contributed a total of \$160.00 to Bernie Sanders’ presidential campaign via ActBlue.

96. Plaintiff Heather Jordan (“Jordan”) is a resident of Rogers, Arkansas. She contributed a total of \$26.50 to Bernie Sanders’ presidential campaign via ActBlue.

97. Plaintiff Rana Kangas-Kent (“Kangas-Kent”) is a resident of Greenbrae, California. She contributed a total of \$156.00 to Bernie Sanders’ presidential campaign via ActBlue.

98. Plaintiff Susan Frisbie (“Frisbie”) is a resident of Grass Valley, California. She contributed a total of \$1,456.80 to Bernie Sanders’ presidential campaign via ActBlue.

99. Plaintiff Bakh Inamov (“Inamov”) is a resident of Greenbrae, California. He contributed a total of \$187.00 to Bernie Sanders’ presidential campaign via ActBlue.

100. Plaintiff Theda Larson-Wright (“Larson-Wright”) is a resident of Arenas Valley, New Mexico. She contributed a total of \$1,012.65 to Bernie Sanders’ presidential campaign via ActBlue.

101. Plaintiff Kirsten Hoffman (“Hoffman”) is a resident of Boston, Massachusetts. She contributed a total of \$2,700.00 to Bernie Sanders’ presidential campaign via ActBlue.

102. Plaintiff Anthony Grudin (“Grudin”) is a resident of Burlington, Vermont. He contributed a total of \$64.00 to Bernie Sanders’ presidential campaign via ActBlue.

103. Plaintiff Bruce Busto (“Busto”) is a resident of Ormond Beach, Florida. He contributed a total of \$375.00 to Bernie Sanders’ presidential campaign via ActBlue.

104. Plaintiff Suzanne M. Cork (“Cork”) is a resident of Battle Mountain, Nevada. She contributed a total of \$10 to the Defendant, DNC Services Corporation D/B/A Democratic National Committee (the “DNC”) in 2016.

105. Plaintiff Emma L. Young (“Young”) is a resident of Chicago, Illinois. She contributed a total of \$15 to the DNC between December 2015 and January 2016. She contributed online.

106. Plaintiff Sean Lynch (“S. Lynch”) is a resident of Wichester, Virginia. He contributed a total of \$3 to the DNC in 2016. He contributed online.

107. Plaintiff Sherry Davis (“S. Davis”) is a resident of Longview, Washington. She contributed a total of \$173 to the DNC in 2015-2016. She contributed in various ways, including online at www.democrats.org.

108. Plaintiff Nancy Berners-Lee (“Berners-Lee”) is a resident of Lexington, Massachusetts. She contributed a total of \$100 to the DNC on or about July 20, 2015. She contributed by check.

109. Plaintiff Phyllis Criddle (“Criddle”) is a resident of North Adams, Massachusetts. She contributed a total of \$18 to the DNC on or about May 16, 2016. She contributed by check.

110. Plaintiff Melissa Liang (“Liang”) is a resident of Royal Oak, Michigan. She is a registered Democrat, and has been for the past 16 years.

111. Plaintiff Joseph Gleason (“Gleason”) is a resident of Seattle, Washington. He is a registered Democrat, and has been for the past eight years.

112. Plaintiff Greta Mickey (“Mickey”) is a resident of Kingston, New York. She is a registered Democrat, and has been for over 10 years.

113. Plaintiff Diane Emily Dreyfus (“Dreyfus”) is a resident of Baltimore, Maryland. She is a registered Democrat, and has been for over 40 years.

114. Plaintiff Kathleen L. Dodge (“Dodge”) is a resident of Turners Falls, Massachusetts. She is a registered Democrat, and has been for 46 years.

115. Plaintiff Catherine Willott (“Willott”) is a resident of Thousand Oaks, California. She is a registered Democrat, and has been for 32 years.

116. Plaintiff Tristan Burgener (“Burgener”) is a resident of Meza, Arizona. He is a registered Democrat, and has been for three years.

117. Plaintiff Erik Michael Ferragut (“Ferragut”) is a resident of Oak Ridge, Tennessee. He is a registered Democrat, and has been for 20 years.

118. Plaintiff Vincent J. Cauchi, Jr. (“Cauchi”) is a resident of Oregon House, California. He is a registered Democrat, and has been for 40 years.

119. Plaintiff Joseph Callan (“Callan”) is a resident of Nipomo, California. He is a registered Democrat, and has been for over five years.

120. Plaintiff Mark Bedard (“Bedard”) is a resident of New York, New York. He is a registered Democrat, and has been for eight years.

121. Plaintiff Barbara Bowen (“Bowen”) is a resident of Mer Rouge, Louisiana. She is a registered Democrat, and has been for the past 15 years.

122. Plaintiff Steve Philipp (“Philipp”) is a resident of Brooklyn, New York. He is a registered Democrat, and has been for the past 16 years.

123. Plaintiff Susan Phillips (“Phillips”) is a resident of Cottage Grove, Wisconsin. She is a registered Democrat, and has been for over 40 years.

124. Plaintiff Richard Boylan (“Boylan”) is a resident of Placerville, California. He is a registered Democrat, and has been for over 35 years.

125. Plaintiff Teri Monaco (“Monaco”) is a resident of Jacksonville, Florida. She is a registered Democrat, and has been for over 10 years.

126. Plaintiff Tukoi Jarrett (“Jarrett”) is a resident of Chicago, Illinois. He is a registered Democrat, and has been for 22 years.

127. Plaintiff AnnMarie Wilson (“Wilson”) is a resident of Garland, Texas. She is a registered Democrat, and has been for 41 years.

128. Plaintiff Andrew Orrino (“Orrino”) is a resident of Fairfield, Connecticut. He is a registered Democrat, and has been for nine years.

129. Plaintiff Craig Richard Currier (“Currier”) is a resident of Albany, Oregon. He is a registered Democrat, and has been for approximately 12 years.

130. Plaintiff Jarath Hemphill (“Hemphill”) is a resident of Syracuse, New York. He is a registered Democrat, and has been for the past 34 years.

131. Plaintiff George Thomas (“Thomas”) is a resident of Seattle, Washington. He is a registered Democrat, and has been for the past 35 years.

132. Plaintiff Rebecca White-Hayes (“White-Hayes”) is a resident of Bradley, Illinois. She is a registered Democrat, and has been for the past 22 years.

133. Plaintiff Alaina Talboy (“Talboy”) is a resident of Wesley Chapel, Florida. She is a registered Democrat, and has been for over 10 years.

134. Plaintiff Sarah López (“López”) is a resident of Hillsboro, Oregon. She is a registered Democrat, and has been for the past 16 years.

135. Plaintiff Eliza Feero (“Feero”) is a resident of Scotia, New York. She is a registered Democrat, and has been for the past 13 years.

136. Plaintiff Rebecca Hohm (“Hohm”) is a resident of St. Louis, Missouri. She is a registered Democrat, and has been for the past 30 years.

137. Plaintiff Gayle Ann Harrod (“Harrod”) is a resident of Westminster, Maryland. She is a registered Democrat, and has been for approximately 30 years.

138. Plaintiff Erika Sitzer (“Sitzer”) is a resident of Louisburg, North Carolina. She is a registered Democrat, and has been for approximately eight years.

139. Plaintiff Stephen Houseknecht (“Houseknecht”) is a resident of Buffalo, New York. He is a registered Democrat, and has been for the past 44 years.

140. Plaintiff Diane Robinson (“Robinson”) is a resident of Mill Valley, California. She is a registered Democrat, and has been for approximately 28 years.

141. Plaintiff Jen Betterley (“Betterley”) is a resident of Seattle, Washington. She is a registered Democrat, and has been for at least 10 years.

142. Plaintiff Amalie Duvall (“Duvall”) is a resident of Boonville, Missouri. She is a registered Democrat, and has been for approximately 23 years.

143. Plaintiff John Crowe (“Crowe”) is a resident of Omaha, Nebraska. He is a registered Democrat, and has been for approximately five years.

144. Plaintiff Carl Miller (“Miller”) is a resident of Mint Hill, North Carolina. He is a registered Democrat, and has been for the past 24 years.

145. Plaintiff Susan Roppel (“Roppel”) is a resident of Wyandotte, Michigan. She is a registered Democrat, and has been for approximately 32 years.

146. Plaintiff Diana Flores (“Flores”) is a resident of Antioch, Tennessee. She is a registered Democrat, and has been for the past eight years.

147. Plaintiff Julianna Seymour (“Seymour”) is a resident of Huntington Station, New York. She is a registered Democrat, and has been for the last 13 years.

148. Plaintiff Melissa Marcotte (“Marcotte”) is a resident of Providence, Rhode Island. She is a registered Democrat, and has been for approximately 13 years.

149. Plaintiff Danielle Ingrassia (“Ingrassia”) is a resident of Vacaville, California. She is a registered Democrat, and has been for over eight years.

150. Plaintiff Alette Prichett (“Prichett”) is a resident of Hollister, California. She is a registered Democrat, and has been for over 15 years.

151. Plaintiff Torsha Childs (“Childs”) is a resident of Brooklyn, New York. She is a registered Democrat, and has been for over 25 years.

152. Plaintiffs represent only a fraction of the individuals who are willing and able to serve as class representatives in this action. In the past several weeks, over 1,000 additional members of the proposed classes have volunteered to be class representatives, and have retained undersigned counsel in order to do so. Within the same timeframe, undersigned counsel have received over 13,000 inquiries from potential class members seeking information about the suit, and inquiries continue to come in.

Defendants

153. Defendant, DNC Services Corporation, d/b/a Democratic National Committee (the “DNC”), at all times relevant hereto, was and is a not-for-profit corporation organized under the laws of the District of Columbia and is the operating body of the United States Democratic Party. The DNC maintains its principal place of business at 430 South Capitol Street Southeast in Washington, District of Columbia.

154. Defendant, Deborah “Debbie” Wasserman Schultz (“Wasserman Schultz”) has been the Chairperson of the DNC since 2011. Wasserman Schultz maintains offices in Pembroke Pines, Florida, and Aventura, Florida, in addition to offices in Washington, D.C.

Non-Party

155. Non-party ActBlue is a United States political action committee established in June 2004 that enables online fundraising for Democratic Party campaigns. ActBlue charges a 3.95% “processing” fee for each contribution. Some Plaintiffs utilized ActBlue’s online services to make the contributions referred to herein.

GENERAL FACTS

156. The DNC is the formal governing body for the United States Democratic Party. The DNC is responsible for coordinating strategy in support of Democratic Party candidates for local, state, and national office.

157. As part of its duties, the DNC organizes the Democratic National Convention every four years to nominate and confirm a candidate for President, and establishes rules for the state caucuses and primaries that choose delegates to the convention.

158. Since 2011, Wasserman Schultz has been Chairperson of the DNC. Wasserman Schultz has also served as the U.S. Representative for Florida's 23rd congressional district since 2013; before then, she represented Florida's 20th district in the U.S. House of Representatives starting in 2005.

159. The DNC is governed by the Charter and Bylaws of the Democratic Party. These governing documents expressly obligate the DNC to maintain a neutral posture with respect to candidates seeking the party's nomination for President during the nominating process. Article 5, Section 4 of the Charter states:

The National Chairperson shall serve full time and shall receive such compensation as may be determined by agreement between the Chairperson and the Democratic National Committee. In the conduct and management of the affairs and procedures of the Democratic National Committee, particularly as they apply to the preparation and conduct of the Presidential nominating process, the Chairperson **shall exercise impartiality and evenhandedness** as between the Presidential candidates and campaigns. The Chairperson shall be responsible for ensuring that the national officers and staff of the Democratic National Committee **maintain impartiality and evenhandedness** during the Democratic Party Presidential nominating process.

(emphasis added).

160. Consistent with what the Charter requires, the DNC, through Wasserman Schultz and other employees, and from the very beginning of the presidential race, has consistently and publicly affirmed its impartiality and evenhandedness with respect to the nominating process for the Democratic nominee for President in 2016. For example:

a) A September 3, 2015 article in *Politico* reporting on Wasserman Schultz's relationships with Hillary Clinton and Joe Biden quoted Wasserman Schultz as saying, "I count both Secretary Clinton and Vice President Biden as dear friends, but no matter who comprises our field of candidates it's my job to run a neutral primary process and that's what I am committed to doing[.]"¹

b) A September 16, 2015 article in *The Daily Beast* on the Democratic candidate debate schedule quoted DNC spokesperson Holly Shulman ("Shuman") as stating, "[t]he DNC runs an impartial primary process."²

c) Shulman was also quoted in an article appearing in the Daily Mail Online (UK) on October 16, 2015, as stating, "[t]he DNC runs an impartial primary process, period."³

¹ See Edward-Isaac Dovere & Marc Caputo, "Wasserman Schultz's divided loyalties," **Politico**, available at <http://www.politico.com/story/2015/09/debbie-wasserman-schultz-joe-biden-hillary-clinton-2016-loyalty-213294> (last visited June 20, 2016).

² See Olivia Nuzzi, "Is the Democratic National Committee in the Tank for Hillary?," **The Daily Beast**, available at <http://www.thedailybeast.com/articles/2015/09/16/is-the-democratic-national-committee-in-the-tank-for-hillary.html> (last visited June 20, 2016).

d) In a CNN appearance on May 17, 2016, where she discussed alleged “violence” by supporters of Bernie Sanders at the Nevada State Democratic Convention, Wasserman Schultz stated that, “[t]he Democratic National Committee remains neutral in this primary, based on our rules.”⁴

e) In a statement quoted by the Associated Press on May 21, 2016, while discussing Sanders’ endorsement of her primary opponent for Congress, Wasserman Schultz stated, “[e]ven though Senator Sanders has endorsed my opponent, I remain, as I have been from the beginning, neutral in the presidential Democratic primary.”⁵

161. Despite the requirements in the Charter, and in spite of the multiple public declarations of neutrality and impartiality with respect to the Democratic primary process, the DNC was not neutral. To the contrary, the DNC was biased in favor of one candidate – Hillary Clinton (“Clinton”) – from the beginning and throughout the process. The DNC devoted its

³ See David Martosko, “Democratic National Committeewoman says her party is ‘clearing a path’ for Hillary because ‘the women in charge’ want it that way,” *available at* <http://www.dailymail.co.uk/news/article-3273404/Democratic-National-Committeewoman-says-party-clearing-path-Hillary-women-charge-want-way.html> (last visited June 20, 2016).

⁴ The video may be viewed on the internet at http://www.realclearpolitics.com/video/2016/05/17/debbie_wasserman_schultz_what_happened_at_nevada_convention_was_unacceptable_sanders_added_fuel_to_the_fire.html (last visited June 20, 2016).

⁵ See Tribune news services, “Sanders says he is backing opponent of DNC chair Wasserman Schultz,” **Chicago Tribune** (May 21, 2016), *available at* <http://www.chicagotribune.com/news/nationworld/politics/ct-sanders-dnc-chair-20160521-story.html> (last visited June 20, 2016).

considerable resources to supporting Clinton above any of the other Democratic candidates. Through its public claims to being neutral and impartial, the DNC actively concealed its bias from its own donors as well as donors to the campaigns of Clinton's rivals, including Bernie Sanders ("Sanders").

162. The truth of the DNC's deception started to come to public light in June 2016.

163. On June 14, 2016, officials of the DNC announced that Russian government hackers had penetrated its computer network. The hackers had access to the network for approximately one year. According to the Washington Post, "[t]he intruders so thoroughly compromised the DNC's system that they also were able to read all email and chat traffic" – but in the same article, "[t]he DNC said that no financial, donor or personal information appears to have been accessed or taken[.]"⁶

164. The same day, CrowdStrike – a network security consulting firm retained by the DNC to investigate and respond to the breach – publicly released more details. According to CrowdStrike, two separate hacker groups affiliated with the Russian government, codenamed "Cozy Bear" and "Fancy Bear," were detected as having infiltrated the DNC network. Both groups have a long history of successfully targeting sensitive government and industry computer networks in both the United States and other countries, often using "sophisticated phishing

⁶ See Ellen Nakashima, "Russian government hackers penetrated DNC, stole opposition research on Trump," **The Washington Post** (June 14, 2016), *available at* https://www.washingtonpost.com/world/national-security/russian-government-hackers-penetrated-dnc-stole-opposition-research-on-trump/2016/06/14/cf006cb4-316e-11e6-8ff7-7b6c1998b7a0_story.html (last visited June 23, 2016).

attacks.” CrowdStrike concluded that Cozy Bear’s intrusion of the DNC network began in summer of 2015, while Fancy Bear separately breached it in April 2016.⁷

165. On June 15, 2016, an individual using the name “Guccifer 2.0” established a publicly accessible website (<https://guccifer2.wordpress.com>) and posted a statement taking credit for the DNC server hack.⁸ Below the statement, Guccifer 2.0 posted a series of documents purportedly taken from the DNC’s servers including: (a) a 281-page confidential “Donald Trump Report” purportedly submitted to the DNC on 12/19/15 and containing extensive research on the presumptive Republican presidential nominee; (b) Excel spreadsheets containing the names and personal information of donors to the Democratic Party and Hillary Clinton’s campaign; and (c) a 59-page memorandum marked “Secret” setting forth national security and foreign policy “promises and proposals” and purportedly obtained from Clinton’s personal computer.⁹

166. Among the documents released by Guccifer 2.0 on June 15th is a two-page Microsoft Word file with a “Confidential” watermark that appears to be a memorandum written to the Democratic National Committee regarding “2016 GOP presidential candidates” and dated

⁷ See Dmitri Alperovitch, “Bears in the Midst: Intrusion into the Democratic National Committee,” **CrowdStrike Blog** (June 14, 2016, updated June 15, 2016), *available at* <https://www.crowdstrike.com/blog/bears-midst-intrusion-democratic-national-committee/> (last visited June 23, 2016); Michael Kan, “Russian hackers breach DNC computers, steal data on Donald Trump,” **PCWorld** (June 14, 2016), *available at* <http://www.pcworld.com/article/3083440/security/russian-hackers-breach-dnc-computers-steal-data-on-trump.html> (last visited June 23, 2016).

⁸ See Ellen Nakashima, “‘Guccifer 2.0’ claims credit for DNC hack,” **The Washington Post** (June 15, 2016), *available at* https://www.washingtonpost.com/world/national-security/guccifer-20-claims-credit-for-dnc-hack/2016/06/15/abdcdf48-3366-11e6-8ff7-7b6c1998b7a0_story.html (last visited June 23, 2016).

⁹ Guccifer 2.0, “DNC’s Servers Hacked By A Lone Hacker,” *available at* <https://guccifer2.wordpress.com/2016/06/15/dnc/> (last visited June 23, 2016).

May 26, 2015. A true and correct copy of this document (hereinafter, “DNC Memo”) is attached as **Exhibit 1**.¹⁰

167. The DNC Memo presents, “a suggested strategy for positioning and public messaging around the 2016 Republican presidential field.” It states that, “Our goals in the coming months will be to frame the Republican field and the eventual nominee early and to *provide a contrast between the GOP field and HRC*.¹¹” (emphasis added). The DNC Memo also advises that the DNC, “[u]se specific hits to muddy the waters around ethics, transparency and campaign finance attacks on HRC.” In order to “muddy the waters” around Clinton’s perceived vulnerabilities, the DNC Memo suggests “several different methods” of attack including: (a) “[w]orking through the DNC” to “utilize reporters” and create stories in the media “with no fingerprints”; (b) “prep[ping]” reporters for interviews with GOP candidates and having off-the-record conversations with them; (c) making use of social media attacks; and (d) using the DNC to “insert our messaging” into Republican-favorable press.

168. By the date of the DNC Memo, the Democratic presidential nomination field already included, in addition to Clinton, Bernie Sanders, who announced his candidacy on April 30, 2015.¹² And at the time, there was also widespread speculation that others would soon enter

¹⁰ Despite being asked the question repeatedly, the DNC has never confirmed or denied the authenticity of any of the documents released by Guccifer 2.0. See Reno Berkeley, “DNC Tight-Lipped About Authenticity Of Documents From Guccifer 2.0 Hack,” **Inquisitr** (June 17, 2016), available at <http://www.inquisitr.com/3212344/dnc-tight-lipped-about-authenticity-of-documents-from-guccifer-2-0-hack/> (last visited June 24, 2016).

¹¹ “HRC” is short for Hillary Rodham Clinton.

¹² See Dan Merica, “Bernie Sanders is running for president,” **CNN Politics** (Apr. 30, 2015), available at <http://www.cnn.com/2015/04/29/politics/bernie-sanders-announces-presidential-run/> (last visited June 23, 2016).

the primary race including Joe Biden, Lincoln Chafee, Martin O'Malley, Elizabeth Warren, and Jim Webb.¹³

169. Despite there being every indication that the 2016 Democratic primary would be contested by multiple candidates, including Sanders, the DNC Memo makes no mention of any Democratic candidate except Clinton, and builds the DNC's election strategy on the assumption that Clinton will be the nominee, with no doubts attached. Rather than reflecting an "impartial" or "evenhanded" approach to the nominating process, as required by the Charter, the DNC Memo strongly indicates that the DNC's entire approach to the process was guided by the singular goal of elevating Clinton to the general election contest.

170. On June 18 and 21, 2016, Guccifer 2.0 released additional files purportedly taken from the DNC's servers. Among these documents are even more items that appear to be of a highly sensitive nature including: (a) multiple spreadsheets of donors to the DNC and other organizations, including the Clinton Foundation, containing personal information such as names, email addresses, and phone numbers; (b) a "private and confidential" memorandum to Secretary of Defense Ashton Carter from a senior advisor regarding appointments to the Joint Chiefs of Staff; (c) fee, travel, and lodging requirements for Clinton's paid speeches; (d) Clinton's tax returns; and (e) thousands of pages of research, apparently prepared by DNC staff as well as Clinton's campaign staff, relating to Clinton's candidacy including her "vulnerabilities,"

¹³ See Newsday.com with the Associated Press, "2016 presidential race: Possible Democratic candidates," **Newsday** (Apr. 29, 2015), available at <http://www.newsday.com/news/nation/democrats-who-may-run-for-president-in-2016-from-clinton-to-biden-1.9988978> (last visited June 23, 2016). Of these, only Joe Biden and Elizabeth Warren ultimately decided not to run.

potential attacks, rebuttals, policy positions, and opposition research on the other Democratic candidates.¹⁴

171. These additional files entail further, substantial evidence that the DNC was anything but “impartial,” “evenhanded,” or “neutral” with respect to the Democratic nominating process. To the contrary, and in spite of the governing Charter and its multiple public statements, the DNC devoted its resources to propelling Clinton’s candidacy ahead of all of her rivals, even if this meant working directly against the interests of Democratic Party members, including Bernie Sanders’ supporters.

172. All conditions precedent to the commencement and prosecution to final judgment of this civil action have taken place, have been performed, or have been waived or excused by Defendants.

173. Plaintiffs have been compelled to engage the services of the undersigned attorneys and to pay them a reasonable fee.

CLASS ACTION ALLEGATION

174. Plaintiffs bring this lawsuit on behalf of themselves and the proposed class members under Rules 23(b)(1), (b)(2), and (b)(3) of the Federal Rules of Civil Procedure, as noted below.

¹⁴ See “DNC Researched Clinton Speeches, Travel Records,” **The Smoking Gun** (June 21, 2016), available at <http://www.thesmokinggun.com/documents/crime/dnc-researched-clinton-speeches-travel-records-621985> (last visited June 24, 2016); Salam Marcos, “Guccifer 2.0: ‘Neutral’ DNC Staff Conducted Research for Clinton,” **Progressive Army**, (June 21, 2016) available at <http://progressivearmy.com/2016/06/21/guccifer-2-0-dnc-conducted-research-clinton/> (last visited June 24, 2016); Stephen K. Bannon & Alexander Marlow, “Secret Memo: 42-Page Leaked DNC Document Reveals Clinton Foundation Scandal ‘Vulnerabilities’ For Hillary Clinton,” **Breitbart** (June 21, 2016), available at <http://www.breitbart.com/2016-presidential-race/2016/06/21/secret-memo-42-page-leaked-dnc-document-reveals-clinton-foundation-scandal-vulnerabilities-hillary-clinton/> (June 24, 2016).

175. There are three proposed classes (hereinafter collectively referred to as the “Classes”):

- a) All people or entities who have contributed to the DNC from January 1, 2015 through the date of this action (“DNC Donor Class”);
- b) All people or entities who have contributed to the Bernie Sanders campaign from January 1, 2015 through the date of this action (“Sanders Donor Class”); and
- c) All registered members of the Democratic Party (“Democratic Party Class”).¹⁵

176. Plaintiffs, Cork, Young, S. Lynch, S. Davis, Berners-Lee, and Criddle bring this action on behalf of themselves and the DNC Donor Class. Hereinafter, they will be referred to collectively as the “DNC Donor Class Plaintiffs.”

177. Plaintiffs, Wilding, Rifken, Crawford, Franz, Pulaski, Welch, J. Gonzalez, Plattner, Houle, Bingen, S. Reed, Monson, Coleman, Snyder, M. Shaw, Haney, E. Gonzalez, Cyko, Genna, Blair, Johnston, Rasch, Teegardin, O’Meara, Lew, Reynolds, Smith, Primack, Cassidy, Musick, Bierhoff, Taylor, Singer, Braund, Hale, W. Crandall, Hurst, Weiss, Anderson, Witkowski, Figueroa, Kincaid, Alberts, Roderick, Vaughn, Gale, Deitch-Coulter, Ashcraft, A. Davis, Ronzani, Grim, Consiglio, Lugo, Dade, M. Reed, R. Crandall, Ghan, Settle, Y. Cooper, D. Cooper, Brady, Rousseau, Catterall, Hampton, Bubb, Furreboe, Z. Shaw, Ilarraza, Grooms, Maiurano, Humiston, J. Lynch, Simon, Bates, Goldberg, Washik, Booker, Cole, Sparks,

¹⁵ Specifically excluded from the class definitions are Defendants; the officers, directors, or employees of Defendants; any entity in which Defendants have a controlling interest; and any affiliate, legal representative, heir, or assign of Defendants. Also excluded are any federal, state, or local governmental entities, any judicial officer presiding over this action and the members of his/her immediate family and judicial staff, and any juror assigned to this action.

Gopalakrishnan, Villamar, Jacobson, Dudley, Meneely, Buschini, Maxwell, Meuli, Puckett, Pyles, Chan, Birdsong, Knowlton, Johann, Rogers, Jordan, Kangas-Kent, Frisbie, Inamov, Larson-Wright, Hoffman, Grudin, and Busto bring this action on behalf of themselves and the Sanders Donor Class. Hereinafter, they will be referred to collectively as the “Sanders Donor Class Plaintiffs.”

178. Plaintiffs, Liang, Gleason, Mickey, Dreyfus, Dodge, Willott, Burgener, Ferragut, Cauchi, Callan, Bedard, Bowen, Philipp, Phillips, Boylan, Monaco, Jarrett, Wilson, Orrino, Currier, Hemphill, Thomas, White-Hayes, Talboy, Lopez, Feero, Hohm, Harrod, Sitzer, Houseknecht, Robinson, Betterley, Duvall, Crowe, Miller, Roppel, Flores, Seymour, Marcotte, Ingrassia, Prichett, and Childs bring this action on behalf of themselves and the Democratic Party Class. Hereinafter, they will be referred to collectively as the “Democratic Party Class Plaintiffs.”

179. **Numerosity.** The members of each of the Classes are so numerous that their individual joinder is impracticable.

180. **Existence and Predominance of Common Questions of Law and Fact.** Common questions of law and fact exist as to all members of the Classes and predominate over any questions affecting only individual members of the Classes.

181. **Typicality.** Plaintiffs’ claims are typical of the claims of the members of the Classes they seek to represent, and Plaintiffs have the same claims as those of the other class members they seek to represent.

182. **Adequacy of Representation.** Plaintiffs will fairly and adequately protect the interests of the members of their respective Classes. Plaintiffs have retained counsel highly experienced in class action litigation, and Plaintiffs intend to prosecute this action vigorously. Plaintiffs have no adverse or antagonistic interests to those of the Classes.

183. The prosecution of separate actions by individual members of the Classes would create a risk of inconsistent or varying adjudications with respect to individual members of the Classes which would establish incompatible standards of conduct for the parties opposing the Classes.

184. Defendants acted on grounds generally applicable to the Classes with respect to the matters complained of herein, thereby making appropriate the relief sought herein with respect to each of the Classes as a whole.

CAUSES OF ACTION

COUNT I

(Fraud) (DNC Donor Class & Sanders Donor Class)

185. The DNC Donor Class Plaintiffs and the Sanders Donor Class Plaintiffs re-allege paragraphs 1 through 184 above as if fully set forth herein.

186. Defendants knowingly made false statements and omissions concerning material facts.

187. Defendants intended that the false statements and omissions would induce the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, to rely on them.

188. The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, relied on Defendants' false statements and omissions to their injury.

189. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC

Donor Class and the Sanders Donor Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

190. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class.

COUNT II

(Negligent Misrepresentation) (DNC Donor Class & Sanders Donor Class)

191. The DNC Donor Class Plaintiffs and the Sanders Donor Class Plaintiffs re-allege paragraphs 1 through 184 above as if fully set forth herein.

192. Defendants made misrepresentations and omissions concerning material facts.

193. At the time of the misrepresentations and omissions, Defendants either knew them to be false, made them without knowledge of the truth or falsity, or should have known them to be false.

194. Defendants intended that the misrepresentations and omissions would induce the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, to rely on them.

195. The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, justifiably relied on Defendants' misrepresentations and omissions to their injury.

196. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC

Donor Class and the Sanders Donor Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

197. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class and members of the DNC Donor Class and Sanders Donor Class.

COUNT III

(Violation of § 28-3904 of the D.C. Code) (DNC Donor Class & Sanders Donor Class)

198. The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class re-allege paragraphs 1 through 184 above as if fully set forth herein.

199. For purposes of the allegations in this complaint, the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, are "consumers" pursuant to subsection 28-3901(a)(2) of the District of Columbia Code.

200. For purposes of the allegations in this complaint, Defendants are "persons" pursuant to subsection 28-3901(a)(1) of the District of Columbia Code.

201. Defendants misrepresented as to material facts that had a tendency to mislead the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class.

202. Defendants failed to state material facts, and such failure tended to mislead the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class.

203. As such, Defendants violated subsections 28-3904(e) and 28-3904(f) of the District of Columbia Code.

204. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

205. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class.

COUNT IV

(Unjust Enrichment) (DNC Donor Class)

206. The DNC Donor Class Plaintiffs re-allege paragraphs 1 through 184 above as if fully set forth herein.

207. The DNC Donor Class Plaintiffs and members of the DNC Donor Class conferred benefits on the Defendants, who had knowledge thereof.

208. Defendants voluntarily accepted and retained the benefits conferred.

209. The circumstances are such that it would be inequitable for the Defendants to retain the benefits without paying the value thereof to the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

210. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to

the DNC Donor Class Plaintiffs and members of the DNC Donor Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

211. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

COUNT V

(Breach of Fiduciary Duty) (Democratic Party Class)

212. The Democratic Party Class Plaintiffs re-allege paragraphs 1 through 184 above as if fully set forth herein.

213. Defendants had a fiduciary duty to the Democratic Party Class Plaintiffs and members of the Democratic Party Class.

214. Defendants breached their fiduciary duty to the Democratic Party Class Plaintiffs and members of the Democratic Party Class.

215. The Democratic Party Class Plaintiffs and members of the Democratic Party Class have been proximately damaged by Defendants' breach.

216. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the Democratic Party Class Plaintiffs and members of the Democratic Party Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

217. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of the Democratic Party Class Plaintiffs and members of the Democratic Party Class.

COUNT VI

**(Negligence)
(DNC Donor Class)**

218. The DNC Donor Class Plaintiffs as re-allege paragraphs 1 through 184 above as if fully set forth herein.

219. Defendants owed a duty to the DNC Donor Class Plaintiffs and members of the DNC Donor Class to use and exercise reasonable and due care in obtaining, retaining, and securing the personal and financial information provided to them in connection with their contributions to the DNC.

220. Defendants owed a duty to the DNC Donor Class Plaintiffs and members of the DNC Donor Class to provide security, consistent with industry standards and requirements, to ensure that the DNC's computer systems and networks, and the personnel responsible for them, adequately protected the personal and financial information of the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

221. Defendants owed a duty of care to the DNC Donor Class Plaintiffs and members of the DNC Donor Class because they were a foreseeable and probable victim of any inadequate data security practices. Defendants solicited, gathered, and stored the sensitive financial and personal data provided by the DNC Donor Class Plaintiffs and members of the DNC Donor Class to facilitate their contributions. Defendants knew they inadequately safeguarded this information on the DNC computer systems and that sophisticated hackers routinely attempted to access this valuable data without authorization. Defendants knew that a breach of the system would inflict considerable damages upon the DNC Donor Class Plaintiffs and members of the DNC Donor Class, and Defendants were therefore charged with a duty to adequately protect this critically sensitive information.

222. Defendants maintained a special relationship with the DNC Donor Class Plaintiffs and members of the DNC Donor Class. The DNC Donor Class Plaintiffs and members of the DNC Donor Class entrusted Defendants with their personal and financial information on the assumption that Defendants would safeguard this information, and Defendants were in a position to protect against the harm suffered by the DNC Donor Class Plaintiffs and members of the DNC Donor Class as a result of the network breaches.

223. In light of their special relationship with the DNC Donor Class Plaintiffs and members of the DNC Donor Class, Defendants knew, or should have known, of the risks inherent in collecting and storing the personal and financial information of the DNC Donor Class Plaintiffs and members of the DNC Donor Class, and the importance of providing adequate security of that information.

224. Defendants breached the duties they owed to the DNC Donor Class Plaintiffs and members of the DNC Donor Class by failing to exercise reasonable care and implement adequate security protocols – including protocols consistent with industry standards – sufficient to protect the personal and financial information of the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

225. Defendants breached the duties they owed to the DNC Donor Class Plaintiffs and members of the DNC Donor Class by failing to properly implement technical systems or security practices that could have prevented the theft of the information at issue.

226. Defendants breached the duties they owed to the DNC Donor Class Plaintiffs and members of the DNC Donor Class by failing to properly maintain the sensitive personal and financial information of the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

Given the risk involved and the amount of data at issue, Defendants breach of their duties was entirely unreasonable.

227. As a direct and proximate result of Defendants' negligent conduct, the DNC Donor Class Plaintiffs and members of the DNC Donor Class have suffered injury and are entitled to damages in an amount to be proven at trial.

228. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the safety and rights of the DNC Donor Class Plaintiffs and members of the DNC Donor Class.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for a judgment:

229. For declaratory and injunctive relief declaring illegal and enjoining, preliminarily and permanently, Defendants' violation of and failure to follow the Charter and Bylaws of the Democratic Party;

230. Certification of this action as a class action, designation of Plaintiffs as class representatives and undersigned counsel as class counsel;

231. For compensatory, general, restitutionary, restorative, statutory, treble, and special damages for Plaintiffs against Defendants;

232. Exemplary/punitive damages as against Defendants in an amount sufficient to deter and to make an example of Defendants;

233. Attorneys' fees and costs;

234. Prejudgment and post-judgment interest; and

235. The cost of this suit and such other relief as the court finds just and proper.

JURY DEMAND

236. Plaintiffs demand a jury trial on all issues so triable.

DATED: July 13, 2016

RESPECTFULLY SUBMITTED,

/s/ Jared H. Beck

By: Jared H. Beck

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Counsel for Plaintiffs and the Proposed Classes

TAB/DOCKET NO.
8-1

Exhibit 1

To: The Democratic National Committee
Re: 2016 GOP presidential candidates
Date: May 26, 2015

Below, please find a suggested strategy for positioning and public messaging around the 2016 Republican presidential field. Ultimately, we need to

Our Goals& Strategy

Our goals in the coming months will be to frame the Republican field and the eventual nominee early and to provide a contrast between the GOP field and HRC. Over the long-term, these efforts will be aimed at getting us the best match-up in the general election, and weakening the eventual nominee through the course of the primary. We have outlined three strategies to obtain our goal:

- 1) Highlight when GOP candidates are outside of the mainstream on key issues, ideally driving the rest of the field to follow with positions that will hurt them in a general election;
- 2) Damage Republican presidential candidates' credibility with voters by looking for targeted opportunities to undermine their specific messaging;
- 3) Use specific hits to muddy the waters around ethics, transparency and campaign finance attacks on HRC

Operationalizing the Strategy

Highlighting Extreme or Unpopular Positions

There are two ways to approach the strategies mentioned above. The first is to use the field as a whole to inflict damage on itself similar to what happened to Mitt Romney in 2012. The variety and volume of candidates is a positive here, and many of the lesser known can serve as a cudgel to move the more established candidates further to the right. In this scenario, we don't want to marginalize the more extreme candidates, but make them more "Pied Piper" candidates who actually represent the mainstream of the Republican Party. In these issues, we would elevate statements and policies from any candidate—including second and third-tier candidates—on issues that will make them seem too far to the right on social issues and too far from the priorities of everyday Americans on economic issues.

Undermining Their Message& Credibility, Based on our General Election Priorities

In addition to pinning down the field on key issues, we will work to undermine the Republican candidate's specific messaging, while keeping in mind which candidates and which messages we believe are most powerful. These messages and the responses to them will change given new campaign positioning and new learnings from polling and research, but on these issues, we will keep the focus on the most likely candidates to allow some possibility for growth with the weaker candidates.

- Jeb Bush
 - What to undermine: the notion he is a "moderate" or concerned about regular Americans; perceived inroads with the Latino population.
- Marco Rubio

- What to undermine: the idea he has “fresh” ideas; his perceived appeal to Latinos and younger voters
- Scott Walker
 - What to undermine: his Wisconsin record, particularly on jobs; the idea he can rally working- and middle class Americans.
- Rand Paul
 - What to undermine: the idea he is a “different” kind of Republican; his stance on the military and his appeal to millennials and communities of color.
- Chris Christie
 - What to undermine: his success as governor, his hypocrisy in telling it like it is vs. his ethical issues and acts of a typical politician.

Muddying the Waters

As we all know, the right wing attack machine has been building its opposition research on Hillary Clinton for decades. HRC's critics have been telegraphing they are ready to attack and do so with reckless abandon. While reporters have much less of an appetite for ethics stories about GOP candidates, we will utilize the research to place highly targeted hits—for example, GOP candidates taking positions supported by their major super PAC donors.

Tactics

Working with the DNC and allied groups, we will use several different methods to land these attacks, including:

- **Reporter Outreach:** Working through the DNC and others, we should use background briefings, prep with reporters for interviews with GOP candidates, off-the-record conversations and oppo pitches to help pitch stories with no fingerprints and utilize reporters to drive a message.
- **Releases and Social Media:** Where appropriate these attacks can be leveraged for more public release, particularly the attacks around specific issues where a public release can point out that Republicans are outside of the mainstream.
- **Bracketing Events:** Both the DNC and outside groups are looking to do events and press surrounding Republican events to insert our messaging into their press and to force them to answer questions around key issues.

We look forward to discussing this strategy further. Our goal is to use this conversation to answer the questions who do we want to run against and how best to leverage other candidates to maneuver them into the right place.