

EXHIBIT A

From: Bryan Tyson <btyson@taylorenghish.com>

Sent: Thursday, June 11, 2020 4:36 PM

To: Cross, David D. <DCross@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>

Cc: Bruce Brown <bbrown@brucebrownlaw.com>; Robert McGuire <ram@lawram.com>; Cary Ichter <Clichter@IchterDavis.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Brian Lake <Brian.Lake@robbinsfirm.com>; cheryl.ringer@fultoncountyga.gov; Carey Miller <carey.miller@robbinsfirm.com>; david.lowman@fultoncountyga.gov; dbrody@lawyerscommittee.org; erosenberg@lawyerscommittee.org; hknapp@khlawfirm.com; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; jpowers@lawyerscommittee.org; kaye.burwell@fultoncountyga.gov; sparks@khlawfirm.com; vrusso@robbinsfirm.com; Cate Berenato <Cate.Berenato@robbinsfirm.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Melanie Johnson <melanie.johnson@robbinsfirm.com>

Subject: RE: Curling v. Raffensperger - Extension request

- External Email -

David,

My prior email outlines our position and we will be prepared to explain the fiscal situation of our clients to the judge.

Thanks,

Bryan



Bryan P. Tyson

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

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From: Cross, David D. <DCross@mofo.com>

Sent: Thursday, June 11, 2020 3:06 PM

To: Bryan Tyson <btyson@taylorenghish.com>; Kaiser, Mary <MKaiser@mofo.com>

Cc: Bruce Brown <bbrown@brucebrownlaw.com>; Robert McGuire <ram@lawram.com>; Cary Ichter <Clichter@IchterDavis.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Brian Lake <Brian.Lake@robbinsfirm.com>; cheryl.ringer@fultoncountyga.gov; Carey Miller <carey.miller@robbinsfirm.com>; david.lowman@fultoncountyga.gov; dbrody@lawyerscommittee.org; erosenberg@lawyerscommittee.org; hknapp@khlawfirm.com; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; jpowers@lawyerscommittee.org; kaye.burwell@fultoncountyga.gov; sparks@khlawfirm.com; vrusso@robbinsfirm.com; Cate Berenato <Cate.Berenato@robbinsfirm.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Melanie Johnson <melanie.johnson@robbinsfirm.com>

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Bryan –

This is unreasonable. You waited months before responding to our proposed sample, and your response came in the form of a motion rather than the Court-ordered effort to work with us on a compromise solution. By waiting until now to deal with this rather than months ago when we sent our proposed sample, you've put us in the middle of a still-growing health pandemic and substantial civil unrest here in the nation's capital, which has our office closed and our attorneys and staff working remotely while also managing childcare and other significant responsibilities at home since schools and many other facilities remain closed.

Please reconsider. If this were so urgent that a two-week extension can't be agreed upon, it shouldn't have taken you months to file your motion or otherwise respond to our sample. Having taken so long to pursue this, you can afford us a mere two weeks to respond.

Thanks,
DC

From: Bryan Tyson <btyson@taylorenghish.com>

Sent: Thursday, June 11, 2020 2:56 PM

To: Kaiser, Mary <MKaiser@mofo.com>

Cc: Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucebrownlaw.com>; Robert McGuire <ram@lawram.com>; Cary Ichter <Clichter@IchterDavis.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Brian Lake <Brian.Lake@robbinsfirm.com>; cheryl.ringer@fultoncountyga.gov; Carey Miller <carey.miller@robbinsfirm.com>; david.lowman@fultoncountyga.gov; dbrody@lawyerscommittee.org; erosenberg@lawyerscommittee.org; hknapp@khlawfirm.com; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; jpowers@lawyerscommittee.org; kaye.burwell@fultoncountyga.gov; sparks@khlawfirm.com; vrusso@robbinsfirm.com; Cate Berenato <Cate.Berenato@robbinsfirm.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Melanie Johnson <melanie.johnson@robbinsfirm.com>

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Mary,

Unfortunately, under these unique and difficult circumstances, we cannot consent to a two-week extension, which will cost state taxpayers an additional \$18,000 in storage costs for the DREs. Our client cannot justify that expense given that the legislature returning to session on June 15 to consider massive cuts to the state budget. We have long raised our concerns about the costs of storage, but we were unable to reach an informal solution. Under any other circumstance, and as our past conduct has demonstrated, we would consent to an extension. The current fiscal situation faced by state policymakers restrains us from doing so now.

Thanks,

Bryan



Bryan P. Tyson

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From: Kaiser, Mary <MKaiser@mofo.com>

Sent: Thursday, June 11, 2020 11:32 AM

To: Bryan Tyson <btyson@taylorenghish.com>

Cc: Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>; Robert McGuire <ram@lawram.com>; Cary Ichter <Clichter@IchterDavis.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Brian Lake <Brian.Lake@robbinsfirm.com>; cheryl.ringer@fultoncountyga.gov; Carey Miller <carey.miller@robbinsfirm.com>; david.lowman@fultoncountyga.gov; dbrody@lawyerscommittee.org; erosenberg@lawyerscommittee.org; hknapp@khlawfirm.com; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; jpowers@lawyerscommittee.org; kaye.burwell@fultoncountyga.gov; sparks@khlawfirm.com; vrusso@robbinsfirm.com; Cate Berenato <Cate.Berenato@robbinsfirm.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Melanie Johnson <melanie.johnson@robbinsfirm.com>

Subject: Curling v. Raffensperger - Extension request

Bryan,

The Curling and Coalition Plaintiffs seek a two-week extension to respond to the State's June 1 motion to modify the Court's preservation orders, making our responses due on Monday June 29. Given the challenges of the current environment, including our offices being closed and our teams working remotely, we need the additional time. Please let us know by 4:00pm ET today whether you will consent to this extension.

Thanks,
Mary

MARY KAISER

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