

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**PLAINTIFFS' JOINT WITNESS LIST
FOR PRELIMINARY INJUNCTION HEARING**

Pursuant to this Court's Order by docket entry on August 25, 2020, Plaintiffs identify below the witnesses—and the anticipated subject and time for their examination of each witness—whom they plan to call at the hearing on Plaintiffs' Motions for Preliminary Injunction (Dkt. 785, 800 , 809). Because Plaintiffs cannot predict or estimate the time Defendants will use for cross-examination, the time estimates below reflect the time Plaintiffs will jointly use to examine each witness. And because discovery is still proceeding and Defendants have not yet filed their sur-replies further opposing Plaintiffs' Motions for Preliminary Injunction, Plaintiffs do not yet know the precise time they will need with each witness and therefore have provided estimated ranges for the witnesses. Plaintiffs of course will approach each examination efficiently, focusing on those issues that matter most at this stage.

Plaintiffs propose an equal split (50/50) of the time available for the hearing on September 10 and 11 between all Plaintiffs on the one hand and all Defendants on the other hand. Each side will coordinate how the respective parties will use their allotted time. Each side would use its time for all witness examinations it conducts (directs, crosses, redirects, and re-crosses) as well as arguments, to the extent requested by the Court. The parties will use a “chess clock” approach to track each side’s accumulated time, and no additional time beyond that allocated to either side shall be used without the Court’s permission upon a showing of good cause. This process will ensure an equitable, expedient hearing that best meets the needs of the parties and the Court.

Witness	Subjects of Testimony	Estimated Examination Time
Harri Hursti <i>Founding Partner, Nordic Innovation Labs</i>	Election security and public interest element of the preliminary injunction request.	<u>Direct</u> : 20-30 minutes
Philip Stark <i>Associate Dean of Mathematical and Physical Sciences, University of California, Berkeley</i>	Election integrity and public interest element of the preliminary injunction request.	<u>Direct</u> : 10-15 minutes
Kevin Skoglund <i>Digital Security Consultant</i>	Election security.	<u>Direct</u> : 10-15 minutes

Jeanne Dufort <i>Morgan County Voter</i>	Public interest element of the preliminary injunction request.	<u>Direct</u> : 5-10 minutes
Alex Halderman <i>Professor of Computer Science and Engineering at the University of Michigan</i>	Election security and public interest element of the preliminary injunction request.	<u>Direct</u> : 25-35 minutes
Gabriel Sterling <i>Voting Implementation Manager, Secretary of State for the State of Georgia</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross</u> : 10 minutes
Chris Harvey <i>Elections Director, Secretary of State for the State of Georgia</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross</u> : 10-20 minutes
Richard Barron <i>Director, Registration and Elections, Fulton County, Georgia</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross</u> : 10-15 minutes
Merritt Beaver <i>Chief Information Officer, office of the Secretary of State for the State of Georgia</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross</u> : 10-15 minutes
Dr. Juan Gilbert <i>Chair, Department of Computer & Information Science, Herbert Wertheim College of Engineering, Gainesville, Florida</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross</u> : 10-20 minutes

Dominion Voting Systems Corporation <i>Witness to be provided pursuant to Federal Rule of Evidence 30(b)(6)</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross: 20-30 minutes</u>
--	--	-----------------------------

Plaintiffs reserve the right to cross-examine any witnesses called by Defendants and to redirect any of the above witnesses within the time allotted. Plaintiffs also reserve the right to supplement this list as appropriate. Plaintiffs further reserve the right to call additional witnesses beyond those identified above for rebuttal purposes.

Respectfully submitted this 2nd day of September, 2020.

/s/ David D. Cross

David D. Cross (*pro hac vice*)
 John P. Carlin (*pro hac vice*)
 Lyle P. Hedgecock (*pro hac vice*)
 Mary G. Kaiser (*pro hac vice*)
 Robert W. Manoso (*pro hac vice*)
 MORRISON & FOERSTER LLP
 2000 Pennsylvania Avenue, NW
 Suite 6000
 Washington, DC 20006
 (202) 887-1500

/s/ Halsey G. Knapp, Jr.

Halsey G. Knapp, Jr.
 GA Bar No. 425320
 Adam M. Sparks
 GA Bar No. 341578
 KREVOLIN & HORST, LLC
 1201 West Peachtree Street, NW
 Suite 3250
 Atlanta, GA 30309
 (404) 888-9700

Counsel for Plaintiffs Donna Curling, Donna Price & Jeffrey Schoenberg

/s/ Bruce P. Brown

Bruce P. Brown
 Georgia Bar No. 064460
 BRUCE P. BROWN LAW LLC

/s/ Robert A. McGuire, III

Robert A. McGuire, III
 Admitted Pro Hac Vice
 (ECF No. 125)

1123 Zonolite Rd. NE
Suite 6
Atlanta, Georgia 30306
(404) 881-0700

ROBERT MCGUIRE LAW FIRM
113 Cherry St. #86685
Seattle, Washington 98104-2205
(253) 267-8530

Counsel for Coalition for Good Governance

/s/ Cary Ichter

Cary Ichter
Georgia Bar No. 382515
ICHTER DAVIS LLC
3340 Peachtree Road NE
Suite 1530
Atlanta, Georgia 30326
(404) 869-7600

*Counsel for William Digges III, Laura Digges,
Ricardo Davis & Megan Missett*

/s/ John Powers

John Powers
David Brody
Lawyers' Committee for Civil Rights
Under Law
1500 K St. NW, Suite 900
Washington, DC 20005
(202) 662-8300

Counsel for Coalition Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER , ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2020, a copy of the foregoing **PLAINTIFFS' JOINT IDENTIFICATION OF WITNESSES FOR PRELIMINARY INJUNCTION HEARING** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross