

**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

**CURLING PLAINTIFFS' MOTION *IN LIMINE* TO PRECLUDE
UNNECESSARY AND IMPROPER EXAMINATION OF WITNESSES
AND FOR PROTECTIVE ORDER**

Pursuant to Federal Rules of Evidence 611(a)(3), 401, and 403 and Federal Rules of Civil Procedure 26(c)(1), Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the "Curling Plaintiffs") move *in limine* to preclude the unnecessary and improper examination of Plaintiff witnesses and for a protective order prohibiting Defendants from calling them to testify live at the evidentiary hearing held on September 10-11, 2020.

Pursuant to Rule 7.1(A) of the Local Rules of the Northern District of Georgia, and Part III (a) of this Court's Standing Order, Curling Plaintiffs have filed herewith a brief citing legal authorities supporting the motion and the facts relied upon.

Dated: September 8, 2020

Respectfully submitted,

/s/ David D. Cross

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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

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CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2020, a copy of the foregoing **CURLING PLAINTIFFS' MOTION *IN LIMINE* TO PRECLUDE UNNECESSARY AND IMPROPER EXAMINATION OF WITNESSES AND FOR PROTECTIVE ORDER** 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