

**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 & EXHIBIT LIST
FOR PRELIMINARY INJUNCTION HEARING**

Anticipated Witness Order for September 11, 2020¹

Witness	Estimated Examination Time
Dr. Juan Gilbert <i>Chair, Department of Computer & Information Science, Herbert Wertheim College of Engineering, Gainesville, Florida</i>	<u>Cross</u> : 15-20 minutes
Vincent Liu <i>CEO of cyber security consulting firm, Bishop Fox</i>	<u>Direct</u> : 10-15 minutes

¹ Witnesses Harvey, Cobb, and Adida are listed in the order Plaintiffs understand State Defendants intend to present them since Plaintiffs have deferred their examinations to State Defendants' presentation. Hamilton is listed as State Defendants' last witness so that any legitimate confidentiality issues can be addressed in conjunction with the Halderman and Skoglund examinations at the end of the day.

Witness	Estimated Examination Time
Dr. Eric Coomer <i>Director of Product Strategy & Security for Dominion Voting Systems</i>	<u>Direct/Cross</u> : 20-25 minutes
Richard Barron <i>Director, Registration and Elections, Fulton County, Georgia</i>	<u>Cross</u> : 10-15 minutes
Chris Harvey <i>Elections Director, Secretary of State for the State of Georgia</i>	<u>Cross</u> : 20-25 minutes
Jack Cobb <i>Laboratory Director for Pro V&V</i>	<u>Cross</u> : 10-15 minutes
Dr. Benjamin Adida <i>Co-founder and Executive Director of VotingWorks</i>	<u>Cross</u> : 10-15 minutes
David Hamilton <i>Chief Information Security Officer (CISO) for the Office of the Georgia Secretary of State</i>	Potential Confidentiality Claims <u>Cross</u> : 10-15 minutes
Dr. Alex Halderman <i>Professor of Computer Science and Engineering at the University of Michigan</i>	Potential Confidentiality Claims <u>Direct</u> : 25-35 minutes
Kevin Skoglund <i>Digital Security Consultant</i>	Potential Confidentiality Claims <u>Direct</u> : 10-15 minutes

Plaintiffs reserve the right to call any additional witnesses, as appropriate, within the time allotted.

Plaintiffs Exhibits Introduced September 10, 2020

Exhibit No.	Description	Admitted?
PD16	Stark Demonstrative: Georgia Attorney General Contest, 2018	Not Tendered for Admission
PX04	Fulton games	Yes
PX05	Cherokee Xbox games	Yes
PX06	Application log gap	Yes
PX07	Uncounted ICC ballots (Excerpt of Dkt. No. 809-5, Marks Declaration)	Yes
PX07.1	Fulton County ballot examples	Yes
PX12	Ballot 28 different results	Yes
PX13	Adjudicated image 11.59.32	Yes
PX17	Blank Ballot Dufort	Yes

Respectfully submitted this 10th day of September, 2020.

/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 10, 2020, a copy of the foregoing
**PLAINTIFFS' JOINT WITNESS LIST AND EXHIBIT LIST 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