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

#### DONNA CURLING, ET AL., Plaintiffs,

v.

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

BRAD RAFFENSPERGER, ET AL., Defendants.

### CURLING PLAINTIFFS' NOTICE OF JOINDER IN COALITION PLAINTIFFS' AMENDED RULE 59(E) MOTION TO ALTER OR AMEND THE COURT'S OPINION AND ORDER [DOC. 918] <u>REQUIRING PAPER POLLBOOK BACKUPS</u>

Donna Curling, Donna Price and Jeffrey Schoenberg (the "Curling Plaintiffs") hereby join the Coalition Plaintiffs' Amended Rule 59(e) Motion to Alter or Amend the Court's Opinion and Order of September 28, 2020 (Dkt. 918, the "Order"). Curling Plaintiffs support the clarifications sought by Coalition Plaintiffs in their amended motion. (Dkt. 958 at 1.) Curling Plaintiffs especially urge the Court to mandate that the Secretary of State should require county superintendents to cause each polling place to maintain a stock of emergency hand-marked paper ballots ("HMPBs") sufficient to provide for at least 40 percent of the number of registered voters on Election Day and for subsequent elections. (*Id.* at 9-12; Dkt. 931-1 at 2, 4-8 ("a sufficient stock of pre-printed ballots . . . is equal to 40 percent of registered

voters").) Curling Plaintiffs approve of the edits to the Court's Order proposed by Coalition Plaintiffs. (*See* Dkt. 958-1 at 4-5, 8-9, 12, 15.)

Respectfully submitted this 9th day of October, 2020.

<u>/s/ David D. Cross</u> 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

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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.

<u>/s/ David D. Cross</u> David D. Cross

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## **CERTIFICATE OF SERVICE**

I hereby certify that on October 9, 2020, a copy of the foregoing CURLING PLAINTIFFS' NOTICE OF JOINDER IN COALITION PLAINTIFFS' AMENDED RULE 59(E) MOTION TO ALTER OR AMEND THE COURT'S OPINION AND ORDER [DOC. 918] REQUIRING PAPER POLLBOOK BACKUPS 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.

> <u>/s/ David D. Cross</u> David D. Cross