

# **EXHIBIT C**

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

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**DONNA CURLING, ET AL.**

**Plaintiff,**

**v.**

**BRIAN KEMP, ET AL.**

**Defendant.**

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**Civil Action File No. 1:17-cv-  
2989-AT**

**[PROPOSED]  
ORDER  
FOR PRESERVATION OF EVIDENCE  
DURING TRANSFER OF POTENTIAL EVIDENCE**

**UPON CONSIDERATION OF** a letter dated December 8, 2017, from counsel for Defendant Merle King in his individual capacity and his official capacity as Executive Director of the Center for Election Systems at Kennesaw State University, notifying the Court “of a forthcoming transfer of data and equipment from the Center for Election systems (the “CES”) to the Office of Georgia’s Secretary of State, currently set to occur on December 18, 2017”, Plaintiffs seek assurances that any potential evidence transferred will not be altered or destroyed in the process. Accordingly, it is

**ORDERED THAT** any potential evidence related to the claims and defenses in this case which will be physically transferred from CES and Kennesaw

State University to the Georgia Secretary of State, shall be preserved without destruction or alteration in accordance with their obligations to preserve evidence, including but not limited to: (1) data, records and equipment related to elections; (2) communications related to any investigations, vulnerabilities, destruction, alteration, analysis or reports related to the election infrastructure and the conduct of the elections; and (3) any other evidence possessed or controlled by these entities that is relevant to the lawsuit; and it is

**FURTHER ORDERED** that the parties shall continue to honor their obligations in connection with their respective preservation obligations.

**SO ORDERED.**

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**A. TOTENBERG**  
**UNITED STATES DISTRICT JUDGE**

**DATED: DECEMBER \_\_, 2017**