

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

<b>DONNA CURLING, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>CIVIL ACTION FILE NO.</b>
<b>v.</b>	)	
	)	<b>1:17-CV-02989-AT</b>
<b>BRIAN KEMP, et al.,</b>	)	
	)	
	)	
<b>Defendants.</b>	)	
	)	

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**DEFENDANT MERLE KING’S NOTICE OF JOINDER IN RESPONSE  
OF DEFENDANTS KEMP AND STATE ELECTION BOARD  
OFFICIALS TO PLAINTIFF COALITION FOR GOOD GOVERNANCE’S  
MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT**

COMES NOW, Defendant Merle King who has been named in this case in his individual capacity and his official capacity as Executive Director of the Center for Election Systems at Kennesaw State University (“Defendant King”), and notices the Court that he joins in the well-reasoned and thorough Response of Defendants Kemp and State Election Board Officials to Plaintiff Coalition for Good Governance’s Motion for Leave to File Third Amended Complaint, filed on April 9, 2018 (the “Response”). (Doc. No. 166). Particularly as to Defendant King, the proposed Third Amended Complaint makes little sense. If the Court permits this case to proceed in such a fragmented fashion, Defendant King would be left in the awkward position of being named as a defendant by one group of Plaintiffs (in the

currently pending Second Amended Complaint), while not being named as a Defendant by the other group of plaintiffs (in the proposed Third Amended Complaint). As set forth in the Response, this approach is wholly at odds with the requirements of Federal Rule of Civil Procedure 15 and judicial economy.

WHEREFORE, Defendant King respectfully requests the Court deny Plaintiffs Coalition for Good Governance, Laura Digges, William Digges III, and Ricardo Davis's Motion for Leave to File Third Amended Complaint, filed on April 4, 2016.

This 16th day of April, 2018.

**HOLLAND & KNIGHT LLP**

/s/ Grant Edward Lavelle Schnell  
Robert S. Highsmith, Jr.  
State Bar of Georgia No. 352777  
Grant Edward Lavelle Schnell  
Georgia Bar No. 106794

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document was prepared using Times New Roman font, 14-point type, which is one of the font and print selections approved by the Court in L.R. 5.1(B).

This 16th day of April, 2018.

**HOLLAND & KNIGHT LLP**

*/s/ Grant Edward Lavelle Schnell*

Grant Edward Lavelle Schnell

Georgia Bar No. 106794

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this date I have electronically filed the foregoing **DEFENDANT MERLE KING'S NOTICE OF JOINDER IN RESPONSE OF DEFENDANTS KEMP AND STATE ELECTION BOARD OFFICIALS TO PLAINTIFF COALITION FOR GOOD GOVERNANCE'S MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT** with the Clerk of Court using CM/ECF system, which will send email notification of such filing to all attorneys of record.

This 16th day of April, 2018.

**HOLLAND & KNIGHT LLP**

/s/ Grant Edward Lavelle Schnell  
Grant Edward Lavelle Schnell  
Georgia Bar No. 106794