

**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 FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the “Curling Plaintiffs”) move this Court to grant a preliminary injunction prohibiting the Defendants from conducting any further elections through direct recording electronic (DRE) voting units for in-person voting.

In connection with the foregoing requested relief, Curling Plaintiffs request this Court to order Defendants instead (1) to conduct such elections using hand-marked paper ballots, as permitted by Georgia law, (2) to make available at each polling place at least one electronic or mechanical ballot-marking device (BMD) that is in compliance with the Americans with Disabilities Act and Help America Vote

Act, and (3) to provide a minimum of one ballot scanner at each polling place for casting, tabulation, and secure storage of voted paper ballots.

Further, and in connection with the foregoing requested relief, Curling Plaintiffs request this Court to order the Defendants to institute post-election audits of the paper ballots to verify election results.

Pursuant to Rule 65(d), Plaintiffs have filed with this Motion a proposed order directed at the persons to be bound thereby, stating the reasons why the order should issue, stating the order's terms specifically, and describing the acts restrained and required.

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

1. J. Alex Halderman
2. Lowell Finley
3. Rebecca Wilson
4. Donna Curling
5. Donna Price
6. Jeffrey Schoenberg

Dated: May 30, 2019

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 May 30, 2019, a copy of the foregoing **CURLING PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION** 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