

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

DONNA CURLING, et al;)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION
)	FILE NO: 1:17cv02989-AT
BRIAN P. KEMP, et al.;)	
)	
Defendants.)	

FULTON COUNTY DEFENDANTS’
STATEMENT REGARDING PROTECTIVE ORDER DISPUTE

The Members of the Fulton County Board of Registrations and Elections urge the court to enter a protective order that adequately protects the security of the Georgia voting system by requiring the plaintiffs to keep in confidence documents and information discovered that could lead to a security breach. The citizens of Georgia should be protected from the inadvertent disclosure, by county officials throughout the state, of information or documents that could be used to impact the safety and security of the voting process.

Documents produced to the plaintiffs or their counsel are not “documents and information in the public domain.” It is axiomatic that if the true intention of plaintiffs is to ensure accurate and safe voting, then confidential documents or information produced to plaintiffs, should be designated as “confidential” whether or not a confidential designation was stamped on the document at the time of production.

Lastly, documents sensitive enough to be designated as “attorneys’ eyes only” should not be reviewed by lay persons who are not constrained by ethical or professional obligations to keep that information confidential.

Respectfully submitted this 1st day of July, 2019.

OFFICE OF THE COUNTY ATTORNEY

/s/Kaye Woodard Burwell

Kaye Woodard Burwell

Georgia Bar Number: 775060

kaye.burwell@fultoncountyga.gov

Cheryl Ringer

Georgia Bar Number: 557420

cheryl.ringer@fultoncountyga.gov

David Lowman

Georgia Bar Number: 460298

david.lowman@fultoncountyga.gov

ATTORNEYS FOR MEMBERS OF THE
FULTON COUNTY BOARD OF
REGISTRATION & ELECTIONS

141 Pryor Street, S.W.
Suite 4038
Atlanta, Georgia 30303
(404) 612-0251

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing has been prepared in Times New Roman 14-point, a font and type selection approved by the Court in L.R. 5.1(B).

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send counsel of record e-mail notification of such filing.

This 1st day of July, 2019.

/s/Kaye Woodard Burwell

Kaye Woodard Burwell

Georgia Bar Number: 775060

kaye.burwell@fultoncountyga.gov