

**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

**DECLARATION OF J. ALEX HALDERMAN IN SUPPORT OF
PLAINTIFFS' JOINT MOTION FOR SANCTIONS**

J. ALEX HALDERMAN declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

Description of Work in Connection with the GEMS Discovery Dispute

1. I was extensively involved with Curling Plaintiffs' litigation of the production of the GEMS databases, as described in the contemporaneously filed Joint Motion for Sanctions (the "GEMS Dispute").

2. Over several weeks, I communicated extensively via email and teleconference with a team of attorneys at Morrison & Foerster, LLP, and Krevolin & Horst, LLC, regarding the GEMS Dispute. To ensure the aptness of my advice under the circumstances, I also reviewed Defendants' filings and the Court's orders.

3. Upon instructions and with the oversight of counsel, I drafted multiple declarations to support Curling Plaintiffs' filings in the GEMS Dispute, and also reviewed and commented on many of Curling Plaintiffs' draft court filings to improve their quality and accuracy from a technical perspective.

4. I participated in a teleconference with the Court on the subject of the GEMS Dispute on June 28, 2019, and a conference with the Court on the same subject on July 11, 2019.

5. After the Court ordered Defendants to produce the GEMS databases, I prepared a secured environment, compared Defendants' databases to publicly available GEMS databases, and reported my finding to counsel that there was nothing whatsoever unique about the structure of the Georgia GEMS databases. I later testified in a declaration and during the July 26, 2019 hearing to that same effect.

Identification of Time and Expenses

6. On August 13, 2019, Cameron Tepfer of Morrison & Foerster asked me to identify the time and expenses appearing in my invoice dated July 28, 2019, that was related to the GEMS Dispute.

7. That same day, I reviewed my invoice and other records of my activity during the relevant time period and identified the relevant time entries by adding yellow highlight.

8. Today I again reviewed my invoice dated July 28, 2019. I confirm that the highlighted entries accurately identify time and expenses in connection with the GEMS Dispute, but not those time and expenses in connection with the substantive analysis of the GEMS databases that was always intended.

9. Today I also reviewed a new invoice that I generated to cover work between July 29, 2019, and October 4, 2019, and I highlighted the entries to identify time in connection with the GEMS Dispute, but not with substantive analysis of the GEMS databases that was always intended.

10. A true and correct copy of the highlighted invoices are attached to this declaration as **Exhibits A and B**, and their irrelevant entries have been redacted.

11. The total amount of my time on the GEMS Dispute was **53.5 hours**, which at a rate of \$750/hour equals a total of **\$40,125**.

12. Total expenses necessarily incurred for the GEMS Dispute were **\$856.99**, for a total amount of fees and expenses to be recovered of **\$40,981.99**.

Reasonableness of Time, Expenses, and Hourly Rates

13. I have described my qualifications at length in earlier declarations, such as the one I filed on August 7, 2018. Those qualifications remain true and accurate.

14. Based on my professional experience in expert consulting, the amounts of time I expended and the expenses I incurred were reasonable and necessary under the circumstances of the GEMS Dispute.

15. The \$750/hour rate I charged for my work in the GEMS Dispute is my standard rate that I charge paying clients for expert consulting services like the ones I actually provided in the GEMS Dispute.

16. Based on my experience and familiarity with expert consulting on issues of election integrity and security, the hourly rate I charged in connection with the GEMS Dispute is fair and reasonable under the circumstances.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 4th day of October, 2019, in Bregenz, Austria.



J. ALEX HALDERMAN

EXHIBIT A

Date	Description	Hours
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
6/29/2019	Call with Curling and Coalition teams	1.25
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
6/30/2019	Review database declarations	0.50
[REDACTED]	[REDACTED]	[REDACTED]
7/1/2019	Draft declaration	4.50
7/1/2019	Examine BBV files	0.50
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
7/2/2019	Draft declaration re security conditions	2.50
7/2/2019	Call with Curling team and Coalition team	0.75
7/3/2019	Continue drafting declaration	4.00
7/3/2019	Finalize declaration	0.50
7/3/2019	Review filings	0.50
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
7/8/2019	Comments on GEMS reply brief	1.00
7/8/2019	Call with Catherine	0.50
7/9/2019	Conference re Phase I discovery	0.75
7/9/2019	Call with team	0.75
7/9/2019	Public GEMS database analysis	3.75
7/9/2019	Review discovery order	0.50
7/10/2019	Accounts and facilities prep for review	0.50
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
7/10/2019	Select and order equipment for review	1.00
7/11/2019	GEMS database analysis	1.00
7/11/2019	Phase I disclosure discussion	0.50
7/11/2019	Conference with court	1.25

Date	Description	Hours
7/11/2019	Call with team	0.50
7/11/2019	Secure facility prep	3.25
[REDACTED]	[REDACTED]	[REDACTED]
7/11/2019	Call with Catherine and David	0.50
[REDACTED]	[REDACTED]	[REDACTED]
7/12/2019	Set up secure environment	2.00
7/12/2019	Accept delivery of GEMS databases	0.25
[REDACTED]	[REDACTED]	[REDACTED]
7/12/2019	GEMS database analysis	3.75
7/12/2019	Email to Catherine and David	0.50
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
7/15/2019	Call with state defendants re GEMS and malware	0.75
7/15/2019	Conferral with team	0.25
7/15/2019	Database analysis for David	0.50
7/15/2019	GEMS extraction coding and comparison	3.50
7/15/2019	Revise declaration	1.50
[REDACTED]	[REDACTED]	[REDACTED]
7/15/2019	Draft declaration re database similarity	3.25
7/15/2019	Finalize combined declaration	0.50
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
7/20/2019	Deliver GEMS CD for additional counties	0.25
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
7/21/2019	GEMS analysis	0.75
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Date	Description	Hours
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Expenses (receipts attached)

Date	Description	Amount
7/10/2019	Computer for secure environment (Amazon) (Note: Additional item on receipt were unused and returned)	\$ 799.00
7/11/2019	Security camera for secure environment (Amazon)	\$ 57.99
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Services (at \$750/hour) [REDACTED]
[REDACTED] [REDACTED]

Payment is requested upon receipt.

[REDACTED] [REDACTED]

Subtotal Highlighted Services (at \$750/hour)	\$	36,375.00
Subtotal Highlighted Expenses	\$	856.99

EXHIBIT B

Date	Description	Hours
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
9/6/2019	Maintain secure space	0.75
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
10/3/2019	Review sanctions motion	0.50
10/4/2019	Complete declaration re sanctions	0.50

Services (at \$750/hour) [REDACTED]

Payment is requested upon receipt.

[REDACTED]

Subtotal Highlighted Services (at \$750/hour) \$ 3,750.00