

**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**

**COALITION PLAINTIFFS' BRIEF REGARDING  
EMERGENCY UNOPPOSED  
MOTION TO SEAL**

Pursuant to this Court direction (Doc. 811), Coalition Plaintiffs state that the declarations should be sealed because attachments to each of the declarations (Docs. 800-2 and 800-3) contain several voters' personal information (birth dates) on a polling place voter list that was not redacted by counsel prior to filing. Rule 5.2 of the Federal Rules of Civil Procedure requires that such information be redacted. Upon being notified of the error the morning after the filing, Coalition Plaintiffs' moved for the immediate sealing of two declarations (Doc. 801). On August 24, 2020, Coalition Plaintiffs filed redacted copies of the same declarations (Doc. 802), and it is the redacted declarations that are included in the Court's courtesy copy notebooks.

The two unredacted declarations should be sealed because (a) the redacted declarations contain all the relevant information and (b) the unredacted declarations contain information that was not supposed to be filed with the Court pursuant to Rule 5.2.

A proposed order is attached.

Respectfully submitted this 27<sup>th</sup> day of August, 2020.

/s/ Bruce P. Brown

Bruce P. Brown  
Georgia Bar No. 064460  
BRUCE P. BROWN LAW LLC  
1123 Zonolite Rd. NE  
Suite 6  
Atlanta, Georgia 30306  
(404) 881-0700

/s/ Robert A. McGuire, III

Robert A. McGuire, III  
Admitted Pro Hac Vice  
(ECF No. 125)  
ROBERT MCGUIRE LAW FIRM  
113 Cherry St. #86685  
Seattle, Washington 98104-2205  
(253) 267-8530

*Counsel for Coalition for Good Governance*

/s/ Cary Ichter

Cary Ichter  
Georgia Bar No. 382515  
ICHTER DAVIS LLC  
3340 Peachtree Road NE  
Suite 1530  
Atlanta, Georgia 30326  
(404) 869-7600

*Counsel for William Digges III, Laura Digges,  
Ricardo Davis & Megan Missett*

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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/ Bruce P. Brown  
Bruce P. Brown

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 27, 2020, a copy of the foregoing 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/ Bruce P. Brown  
Bruce P. Brown