

**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' NOTICE OF FILING
DECLARATION OF DR. J. ALEX HALDERMAN**

Plaintiffs Donna Curling, Donna Price and Jeffrey Schoenberg (collectively, the "Curling Plaintiffs") submit the attached declaration of Dr. J. Alex Halderman to assist the Court in evaluating the Pro V&V letter report filed by State Defendants. (Dkt. No. 939.) As a precaution, Curling Plaintiffs will file the Halderman Declaration provisionally under seal although they object to the sealing of the Pro V&V report as improper and unsupported.

Respectfully submitted this 3rd day of October, 2020.

/s/ David D. Cross

David D. Cross (*pro hac vice*)

John P. Carlin (*pro hac vice*)

Lyle P. Hedgecock (*pro hac vice*)

Mary G. Kaiser (*pro hac vice*)

Robert W. Manoso (*pro hac vice*)

MORRISON & FOERSTER LLP

2000 Pennsylvania Avenue, NW

Suite 6000

Washington, DC 20006

(202) 887-1500

/s/ Halsey G. Knapp, Jr.

Halsey G. Knapp, Jr.

GA Bar No. 425320

Adam M. Sparks

GA Bar No. 341578

KREVOLIN & HORST, LLC

1201 West Peachtree Street, NW

Suite 3250

Atlanta, GA 30309

(404) 888-9700

Counsel for Plaintiffs Donna Curling, Donna Price & Jeffrey Schoenberg

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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 October 3, 2020, a copy of the foregoing **CURLING PLAINTIFFS' NOTICE OF FILING DECLARATION OF DR. J. ALEX HALDERMAN** 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