

EXHIBIT A

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

| | | |
|-------------------------------|---|---------------------------------|
| DONNA CURLING, ET AL., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | CIVIL ACTION |
| vs. |) | |
| |) | FILE NO. 1:17-cv-2989-AT |
| BRAD RAFFENSPERGER, |) | |
| ET AL., |) | |
| |) | |
| Defendants. |) | |

**PLAINTIFF COALITION FOR GOOD GOVERNANCE’S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT BRAD RAFFENSPERGER**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff Coalition for Good Governance requests that Defendant Georgia Secretary of State Brad Raffensperger (“the Secretary”) produce the following documents in accordance with the Instructions and Definitions set forth below. The documents shall be produced within thirty days of service of these requests at the offices of Bruce P. Brown Law LLC, 1123 Zonolite Rd. NE, Suite 6, Atlanta, Georgia 30306, or at such other time and place as may be agreed upon by the parties or ordered by the Court.

INSTRUCTIONS

1. Prior to answering the following, you are requested to make due and diligent search of your books, records, and papers, with a view to eliciting all information available in this action.

2. If you object to any request, please identify the basis for the objection and identify each document that is being withheld on the basis of that objection. Please also state if, notwithstanding the objection, all responsive documents are being produced.

3. The requests set forth below are deemed to be continuing, so as to require the supplementation of your original production of documents in response to such requests promptly after any additional documents are located.

4. If any document responsive to this request was, but no longer is in your possession, state whether it is missing or lost; if it has been destroyed; if it has been transferred, voluntarily or involuntarily, to others; or if it has otherwise been disposed of. In each instance, identify the document fully, explain the circumstances, and identify the people having knowledge of such circumstances.

5. If you contend that any documents covered in these requests are not reasonably accessible or would be unduly burdensome to locate or produce, identify such documents by category and source and provide detailed information

regarding the burden or cost you claim is associated with the search for or production of such documents.

6. To the extent documents produced in response to this request include electronic documents, such as spreadsheets or databases, you shall produce all such documents in native form, insuring that all formulae and metadata embedded in such documents are produced.

DEFINITIONS

1. The term “communications” means any oral, written, or electronic transmission of information, including without limitation any face-to-face meetings, letters, emails, text messages, social media messaging, or telephone calls.

2. The term “document” is intended to be as comprehensive as the meaning provided in Rule 34 of the Federal Rules of Civil Procedure, and includes, without limitation, all originals of any nature whatsoever, and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded, including electronic storage, in your possession, custody or control, regardless of where located; including, without limiting the generality of the foregoing, emails, spreadsheets, databases, papers, punch cards, printout sheets, movie film, slides, phonograph records, photographs, microfilm, notes, letters, memoranda, ledgers, work sheets, books, magazines, notebooks, diaries, calendars, appointment books, registers, charts, tables, papers, agreements, contracts,

purchase orders, acknowledgments, invoices, order confirmations, authorizations, budgets, analyses, projections, transcripts, minutes of meetings of any kind, correspondence, telegrams, drafts, data processing discs or tapes, and computer produced interpretations thereof, x-rays, instructions, announcements, schedules, price lists, and mechanical or electric sound records and transcripts thereof. In all cases, where originals are not available, document also means identical copies of original documents.

3. The term “GEMS Database” means the Diebold system Microsoft Access database used for programming, recording and reporting the referenced election. It shall have the same meaning as “GEMS database” as used in the Rules and Regulations of the State of Georgia, including Rule 183-1-12.07(5) and (6).

4. The term “person” means any individual, corporation, partnership, proprietorship, association, organization, governmental entity, group of persons or any other entity of whatever nature.

5. The terms “relate to” or “relating to” means consisting of, referring to, regarding, reflecting, supporting, prepared in connection with, used in preparation of, or being in any way logically or factually connected with the matter discussed.

6. The term “Secretary” means the Secretary of State of Georgia and the Office of Secretary of State and all employees, agents, representatives, subsidiaries, affiliates, assignees, or other persons acting or purporting to act on behalf of the Secretary.

7. The term “you” means the Secretary, as defined above.

REQUESTS

1. Electronic copies of the GEMS Databases for the November 6, 2018 election prepared for and transmitted to each Georgia county prior to such election. Include any passwords necessary to access the databases.
2. Electronic copies of the completed GEMS Databases for the November 6, 2018 election prepared by each county for such election and transmitted to the Secretary after the close of the election. Include any passwords necessary to access the databases.

This 27th day of March, 2019.

/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

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing Coalition for Good Governance's First Request for Production of Documents to Defendant Brad Raffensperger upon all counsel by email addressed to:

Kaye Woodard Burwell
Office of the Fulton County Attorney
141 Pryor Street, NW
Suite 4038
Atlanta, Georgia 30303
Kaye.burwell@fultoncountyga.gov

*Counsel for Defendant Fulton County
Board of Registrations and Election*

Vincent Russo
Robbins Ross Alloy Belinfante
Littlefield LLC
500 Fourteenth St. NW
Atlanta, Georgia 30318
vrusso@robbinsfirm.com

*Counsel for Defendant Brad
Raffensperger*

Bryan P. Tyson
Taylor English Duma LLP
1600 Parkwood Circle, Suite 200
Atlanta, Georgia 30339
btyson@taylorenghish.com

*Counsel for Defendant Brad
Raffensperger*

David D. Cross
Catherine Chapple
Morrison & Foerster LLP
2000 Pennsylvania Avenue NW
Washington, DC 20006-1888
dcross@mofocom

*Counsel for Plaintiffs
Donna Curling, et al.*

This 27th day of March, 2019.

/s/Bruce P. Brown
Bruce P. Brown
*Counsel for Plaintiffs Coalition
for Good Governance, et al.*