

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

DONNA CURLING, et al.)	
)	
Plaintiffs,)	CIVIL ACTION
)	
v.)	
)	FILE NO: 1:17-cv-2989-AT
BRAD RAFFENSPERGER, et al.,)	
)	
Defendants.)	

DEFENDANTS’ JOINT RESPONSE TO JUNE 3, 2019 ORDER

COME NOW Defendants Secretary of State Brad Raffensperger, State Election Board, State Election Board Members, Fulton County Board of Registration and Elections (“FCBRE”), and members of the FCBRE, and respond to the Court’s June 3, 2019 Order, by docket entry only. While the parties came to a general agreement on the schedule of the case, at the May 31, 2019 Conference with the Court, Defendants did not have adequate time to consider scheduling issues concerning Curling Plaintiffs’ Motion for Preliminary Injunction, [Doc. 387], filed the evening prior to that Conference. Defendants respond to the Court’s Order requesting opinion on the preliminary injunction schedule proposed by the Coalition Plaintiffs, [Doc. 388, p.2] as follows.

Defendants request the Court consolidate scheduling for the Curling Plaintiffs' Motion for Preliminary Injunction, and the Coalition Plaintiffs' anticipated motion for preliminary injunction. Defendants expressed apprehension regarding the proposed response date for the Curling Plaintiffs' anticipated preliminary injunction due to the July 4th Holiday and scheduled absences of counsel for the Defendants. Defendants have thus altered Coalition Plaintiffs' proposed schedule accordingly without compressing any subsequent reply deadlines. Defendants' proposed schedule¹ is as follows:

Event	State Defendants' Proposed Date	Coalition Plaintiffs' Proposed Date [Doc. 388]
Coalition plaintiffs' Preliminary Injunction Filings	No later than June 21, 2019	No later than June 21, 2019
Defendants' Responses to Both Plaintiffs' Preliminary Injunction Motions Due	July 10, 2019	14 days after Coalition Plaintiffs' Filing, July 5, 2019
Plaintiffs' Replies	July 24, 2019*	14 days after Defendants' Responses, July 19, 2019
Preliminary Injunction Hearing on Curling and Coalition Plaintiffs' Motions	Week of July 28, 2019*	Week of July 21, 2019

¹ Reflected in a Proposed Order, attached as **Exhibit 1**.

* Defendants are amenable to a July 26, 2019 Hearing or otherwise are amenable to a compressed reply schedule if the Court prefers to maintain a Week of July 21, 2019 Hearing.

Respectfully submitted this 4th day of June, 2019.

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/s/ Vincent R. Russo

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing **DEFENDANTS' JOINT RESPONSE TO JUNE 3, 2019 ORDER** has been prepared in Times New Roman 14-point, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Vincent R. Russo

Vincent R. Russo

GA Bar No. 242628

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing **DEFENDANTS' JOINT RESPONSE TO JUNE 3, 2019 ORDER** with the Clerk of Court using the CM/ECF system, which will automatically send counsel of record e-mail notification of such filing.

This 4th day of June, 2019.

/s/ Vincent R. Russo _____
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