

# **EXHIBIT A**

**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**

**PLAINTIFFS' FOURTH JOINT REQUEST FOR PRODUCTION  
OF DOCUMENTS AND INSPECTION OF THINGS  
TO STATE DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (“Rule[s]”), Plaintiffs request that Defendants Secretary of State Brad Raffensperger, the State Election Board, and the State Election Board Members (collectively, the “State Defendants”) produce and make available for inspection the documents on an expedited basis electronically stored information and tangible things specified herein below in this Set of Requests for Production (the “Requests”).

**Definitions**

Plaintiffs hereby incorporate by reference all definitions provided in the Plaintiffs' August 3, 2020 Joint Request for Production of Documents and Inspection of Things to State Defendants.

**Instructions**

Plaintiffs hereby incorporate by reference all instructions provided in the Plaintiffs' August 3, 2020 Joint Request for Production of Documents and Inspection of Things to State Defendants.

**REQUESTS FOR PRODUCTION**

**Request for Production No. 19:**

One of each of the following, including all necessary underlying software, passcodes, usernames, and any other materials or keys required to access the devices and information listed below:

- a. A copy of the EMS database for all counties prior to the discovery of the database issue referenced in the September 25, 2020, 4:25 p.m. e-mail from Chris Harvey (Dkt. No. 916 at 9);
- b. A copy of ImageCast Central election files for Fulton County, as provisioned from the database in (a);

- c. For a representative polling place in Fulton County, as provisioned from the database in (a):
  1. A USB drive containing information from “GA ICX BMD” programming group
  2. A programmed Compact Flash Card for Polling Place Scanner and “rezero” passcode
  3. A programmed Security Key Tab for Polling Place Scanner and passcode
  4. A programmed Technician Card and passcode
  5. A programmed Poll Worker Card and passcode
  6. A document of Ballot Activation Codes.

**Request for Production No. 20:**

One copy of the Democracy Suite EMS software, version 5.5A(GA), including the following:

- a. A copy of the Democracy Suite EMS software, version 5.5A(GA) installation disk used to provision EMS and ICC systems in Georgia;
- b. Any necessary installation keys or passwords;
- c. ImageCast Central software; and,
- d. Election Event Designer software.

**Request for Production No. 21:**

One hard disk image of a fully-configured EMS.

**Request for Production No. 22:**

One hard disk image of a fully-configured ICC.

**Request for Production No. 23:**

One of each of the following after corrective actions and testing by Dominion Systems, Inc., including all necessary underlying software, passcodes, usernames, and any other materials or keys required to access the devices and information listed below:

- a. A copy of the EMS database for all counties;
- b. A copy of ImageCast Central election files for Fulton County, as provisioned from the database in (a);
- c. For a representative polling place in Fulton County, as provisioned from the database in (a):
  1. A USB drive containing information from “GA ICX BMD” programming group
  2. A programmed Compact Flash Card for Polling Place Scanner and “rezero” passcode
  3. A programmed Security Key Tab for Polling Place Scanner and passcode
  4. A programmed Technician Card and passcode
  5. A programmed Poll Worker Card and passcode
  6. A document of Ballot Activation Codes.

Respectfully submitted this 27th day of September, 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

*Counsel for Plaintiffs Donna Curling, Donna Price & Jeffrey Schoenberg*

/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/ 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

/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*

/s/ John Powers

John Powers  
David Brody  
Lawyers' Committee for Civil Rights  
Under Law  
1500 K St. NW, Suite 900  
Washington, DC 20005  
(202) 662-8300

*Counsel for Coalition Plaintiffs*

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**CERTIFICATE OF COMPLIANCE**

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 September 28, 2020, a copy of the foregoing  
**PLAINTIFFS' FOURTH JOINT REQUEST FOR PRODUCTION OF  
DOCUMENTS AND INSPECTION OF THINGS TO STATE DEFENDANTS**  
was served on all counsel of record by electronic delivery of a PDF version.

/s/ David D. Cross  
David D. Cross