

# **EXHIBIT D**

**From:** [Cross, David D.](#)  
**To:** [Bryan Tyson](#); "Cheryl Ringer"  
**Cc:** [Vincent Russo](#); [Cary Ichter](#); [Josh Belinfante](#); [Bruce Brown](#); [Hedgecock, Lyle F.](#); [Halsey G. Knapp, Jr.](#); [Adam M. Sparks](#); [Alexander Denton](#); [Loree Anne Paradise](#); [Bryan Jacoutot](#); [Diane LaRoss](#); [Ascarrunz, Veronica](#); [Brogan, Eileen M.](#); [cheryl.ringer@fultoncountyga.gov](mailto:cheryl.ringer@fultoncountyga.gov); [kaye.burwell@fultoncountyga.gov](mailto:kaye.burwell@fultoncountyga.gov); [david.lowman@fultoncountyga.gov](mailto:david.lowman@fultoncountyga.gov); [Curling Core Team](#); "Robert McGuire"; "Carey Miller"  
**Subject:** Curling Matter  
**Date:** Saturday, September 26, 2020 5:15:33 PM

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Dear Bryan and Cheryl -

Presumably you've seen the Coalition Plaintiffs' filing last night regarding serious problems with the Dominion BMD voting system requiring a systemwide replacement of the election databases. We also understand there are problems in testing central scanners used for tabulating mail-in ballots. These issues, and any others involving the operation and reliability of Georgia's election system, are relevant to our claims. Thus, any materials related to any such issues must be preserved. This includes, but is not limited to, testing materials, election-related equipment/hardware, software, firmware, databases (original and new/replacement), removable media (such as USB drives and scanner memory cards), and communications, reports, assessments, and evaluations related to any such issues. Please confirm by noon ET on Monday that you and your clients (including agents and representatives) will preserve all such materials.

Additionally, we'd appreciate an explanation by 3pm ET on Monday of what exactly has occurred with these issues (including specifically whether this is an issue with the BMD software and/or something else), what's causing the issues, what steps are being taken or anticipated to solve them, when they're expected to be resolved, and what impact this is expected to have on elections this year. And we'd appreciate a production this week of documents related to these issues, which are responsive to our pending document requests.

These look to be serious issues burdening the right to vote in Georgia, and we'd appreciate your prompt cooperation in understanding them.

Thanks.  
DC