

**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

**COALITION PLAINTIFFS’ NOTICE OF FILING IN ADVANCE OF
HEARING ON MARCH 6, 2020**

Pursuant to this Court’s Order [Doc. 714, at 3-4], the Coalition Plaintiffs¹ respectfully submit this Notice of Filing, along with the attached declarations containing new and relevant information regarding the topics the Court intends to cover at the brief hearing set for March 6, 2020, on Plaintiffs’ Motions for Preliminary Injunction [Docs. 619 & 640].

The attachments filed herewith are the following:

- Declaration of Richard DeMillo, bearing on Topics (1), (2), and (4)(a) in the Order [Doc. 714];
- Declaration of Jeanne Dufort, bearing on Topics (1), (2), and (4)(b) in the Order [Doc. 714], and new developments related to ballot secrecy.

¹ The “Coalition Plaintiffs” are Plaintiffs Coalition for Good Governance (“Coalition”), Laura Digges, William Digges III, Megan Missett, and Ricardo Davis.

- Declaration of Rhonda J. Martin, bearing on new developments related to counties' inability to deploy the required minimum number of machines while protecting ballot secrecy; and
- Four exhibits referenced in the declarations of Ms. Martin and Ms. Dufort, including an email from the Georgia Secretary of State's office dated February 13, 2020, a Secretary of State document titled "Precinct Layout to Aid with Privacy Training," and revised Georgia State Election Board Rules 183-1-15-.02 and 183-1-15-.03.

Respectfully submitted this 5th day of March, 2020.

/s/ Bruce P. Brown

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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/ Bruce P. Brown

Bruce P. Brown

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CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2019, a copy of the foregoing 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/ Bruce P. Brown

Bruce P. Brown