

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

FAIR FIGHT ACTION, INC, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

Civ. Act. No. 18-cv-5391 (SCJ)

**PLAINTIFFS' SUPPLEMENTAL STATUS UPDATE PURSUANT TO
THE COURT'S JANUARY 9, 2020 ORDER (ECF No. 194)**

Plaintiffs submit this Supplemental Status Report to update the Court on a development that occurred yesterday afternoon. Shortly after 5:00 p.m., Plaintiffs received an email from Mr. Belinfante about the 238,000 pages of “training materials” that Defendants produced on Wednesday, January 15, 2020. According to the email, Defendants learned, after the production, that at least some documents in the production predate the relevant discovery time-period or are otherwise irrelevant. Mr. Belinfante proposed a “re-production” of the documents to exclude the irrelevant documents or an identification of Bates number of the documents to be excluded.

But, nothing in Mr. Belinfante’s email addresses the fact that these documents were requested months ago in Plaintiffs’ First Request for Production

of Documents (served July 15, 2019). Moreover, nothing in Mr. Belinfante's email addresses the further delay occasioned by Defendants failure to properly produce the documents – even at this late date. And, finally, nothing in Mr. Belinfante's email addresses Defendants' proposed (and wholly unacceptable) date of February 28, 2020—six weeks from now and three and a half months after the close of fact discovery—for the completion of Defendants' document production.

Respectfully submitted this 17th day of January, 2020.

/s/ Leslie J. Bryan

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 17th day of January 2020, I electronically filed the foregoing **PLAINTIFFS' STATUS UPDATE PURSUANT TO THE COURT'S JANUARY 9, 2020 ORDER (ECF No. 194)** with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to Counsel of Record:

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