

**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' REPLY TO DEFENDANTS' RESPONSE (ECF NO. 284)
TO COURT'S QUESTIONS CONCERNING TIMELINESS
OF REQUEST FOR COMMUNICATIONS WITH DECLARANTS**

Plaintiffs, with the Court's permission, hereby submit their Reply to Defendants' Response (ECF No. 284) to the Court's questions (ECF No. 272).

In the aftermath of the 2018 gubernatorial election, Plaintiff Fair Fight Action, Inc., communicated with voters about problems and impediments Georgia voters met when they tried to vote. Many of the voters signed affidavits or declarations recounting their experiences. As of February 14, 2020, Plaintiffs had provided Defendants 312 declarations.¹ Defendants, under the guise of asking for supplementation, now seek communications between Plaintiffs (and Plaintiffs'

¹ Plaintiffs produced an additional single page in the PLTFS-AFF Bates number sequence on March 19, 2020. It was the voter registration card for one of the declarants.

counsel) and declarants.

Regardless of whether the Court deems Defendants' request to be a "new" request or whether the Court deems it to be simply a request for supplementation, Defendants should not prevail. However it is classed, Defendants' request is untimely.

I. The Facts Pertaining to the Declarants.

The history of the timing of when Defendants received the declarations and how depositions were conducted is important to the issue of whether their request for supplementation is timely. Hence, we begin with some background.

A. The Production of the Declarations

On February 27, 2019, Plaintiffs submitted their Initial Disclosures (ECF No. 45) and appended a spreadsheet that listed each of the then-declarants and summarized their stories. Separately (because they contained personal identifying information), but on the same date, Plaintiffs made 229 declarations available to Defendants. Each declaration contained the same or similar language:

I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than as a witness in this litigation.

(Exh. 1, Decl. of Dr. Carlos del Rio, ¶ 6). Thus, thirteen months ago—four months before formal discovery even started—Defendants knew (or certainly should have known) they were free to reach out directly to each and every one of

the declarants. Defendants did not do so.

This Court conducted a scheduling conference on July 11, 2019, (ECF No. 78) and entered an Amended Scheduling Order (ECF No. 79) opening the four-month discovery period on July 15, 2019. As soon as discovery opened, the Parties served discovery including Requests for Production of Documents. (ECF Nos. 82, 83). On August 6, 2019, Plaintiffs filed their Supplemental Initial Disclosure (ECF No. 86) and gave Defendants an additional twenty-nine declarations. Thus, by August 6, 2019, Defendants had 256 declarations or 82 percent of the declarations they would ultimately receive.

Plaintiffs continued producing declarations during the discovery period and, by the November 15, 2019, close of discovery, had provided Defendants with 298 declarations. As discussed in the next paragraph, Plaintiffs produced a limited number of declarations after the close of fact discovery. It was not until February 7, 2020, that Defendants first complained to the Court about the post-November 15, 2019, declarations (ECF No. 221), after which the Court set a deadline of February 14, 2020, for Plaintiffs to identify declarants (ECF No. 225) and a deadline of April 27, 2020, for Defendants to complete their depositions of declarants (ECF No. 228).

Notably missing from any of Defendants' reports to the Court is the actual number of post-November 15, 2019 declarations they received. As the chart

below illustrates, in the period between November 16, 2019, and February 14, 2020, Plaintiffs provided only sixteen more declarations (and it appears that two were duplicates of each other and another was a duplicate of an already-produced declaration so the total was actually thirteen). On March 19, 2020, Plaintiffs also provided an additional page – a voter registration card for one of the declarants whose declaration was produced as one of the thirteen in the post-November 15 period. So, as of February 7, 2020, the date Defendants first complained to the Court about declarations provided after November 15, 2019, Defendants had all but two of the 312 total declarations.

Production Date	Beg. Bates No.	End Bates No.	No. of Declarations
11/19/2019	PLTFS-AFF-1080	PLTFS-AFF-1081	1
11/26/2019	PLTFS-AFF-1082	PLTFS-AFF-1085	1
12/5/2019	PLTFS-AFF-1086	PLTFS-AFF-1097	2
1/21/2020	PLTFS-AFF-1098	PLTFS-AFF-1113	3
2/5/2020	PLTFS-AFF-1114	PLTFS-AFF-1136	7
2/14/2020	PLTFS-AFF-1137	PLTFS-AFF-1143	2
3/19/2020	PLTFS-AFF-1144	PLTFS-AFF-1144	0 (regis card)
		Total Declarations	16

B. The Declarants' Depositions

Just as the timing of the declarations is important, the declarants' depositions are relevant to the issue of the timeliness of Defendants' request for supplementation. Despite having had 227 of the declarations since February 2019, it was not until August 9, 2019, that Defendants sent a letter to Plaintiffs' counsel and said, "we are considering deposing each of the voters identified in your Initial

Disclosures and Supplemental Initial Disclosures.” (Exh. 2). Over the next several weeks, the Parties exchanged correspondence about various discovery matters, including serving their respective written discovery responses in mid-August. (ECF Nos. 90, 93). They also conducted their first in-person meet-and-confer session on September 4, 2019. At that session, Defendants raised the issue of deposing declarants, recognizing those depositions would exceed the ten-deposition limit in Federal Rule of Civil Procedure 30(a)(2)(A)(i). Plaintiffs responded that Defendants could depose whichever declarants they wanted and, if defense counsel would provide Plaintiffs’ counsel the names of the declarants Defendants wanted to depose, Plaintiffs’ counsel would contact the declarants and schedule times for their depositions.² Defendants, however, provided no names, leading Plaintiffs to send Defendants a follow-up letter on September 10, 2019, saying Plaintiffs were still waiting for “a list of the first round of affiants that [Defendants] want to depose.” (Exh. 3). When Defendants still provided no list, Plaintiffs’ counsel simply began scheduling declarants’ depositions to move the case along. It was not until December 3, 2019, two weeks after fact discovery closed, that Defendants sent Plaintiffs their first list of declarants’ names—a list of seventy-five declarants whose depositions Defendants wanted to conduct.

² These depositions typically took less than two hours each and Plaintiffs offered to multi-track the depositions to allow multiple depositions to occur every day.

(Exh. 4).³ By that point, Plaintiffs had already arranged for the eighty-six depositions that had been conducted and an additional six that were already scheduled. In total, Defendants have conducted slightly over 100 depositions of declarants, all of which Plaintiffs arranged.

Now, following the Court's Order allowing them until April 27, 2020, to finish declarant depositions, Defendants have identified sixty-eight declarants they want to depose and have filed Notices of Intent to serve subpoenas⁴ on all of those declarants. Of those, fifty-two people were identified either in Plaintiffs' Initial Disclosures on February 27, 2019, (ECF No. 45)⁵ or in Plaintiffs'

³ Defendants could have simply subpoenaed the witnesses, which Defendants chose not to do. As it was, the declarants—who are not under the control of either Plaintiffs or Defendants—were appearing purely voluntarily.

⁴ Defendants say, ECF No. 284 n.1, Plaintiffs have “refused entirely to cooperate in arranging these depositions.” That statement is false. As Defendants requested for the latest round of declarant depositions, Plaintiffs supplied Defendants with as much contact information as Plaintiffs had for each of the declarants. Plaintiffs placed no limits on how or when Defendants conduct the depositions and told Defendants that Plaintiffs' counsel will make themselves available at Defendants' and the witnesses' convenience. Plaintiffs did not assert any objection to the subpoenas, including to the included requests for production of communications between Plaintiffs, Plaintiffs' representatives, and the declarant. That is not a “refusal to cooperate.” Moreover, throughout last fall and despite having no legal obligation to do so, Plaintiffs arranged for each of the 100 plus depositions that has taken place to date, including contacting the witnesses, scheduling deposition times, providing conference rooms, and feeding defense counsel and the witnesses breakfast and lunch—efforts that were time-consuming and expensive.

⁵ Declarants Sam Awad, Kia Carter, Dinesh Chandra, Veneeta Damineni, Chris Duncan, Theodore Evans, Ora Gadson, Atlas Gordon, James Hamelburg, Dasia

Supplemental Initial Disclosures on August, 6, 2019, (ECF No. 86).⁶ Defendants have offered no explanation why those people were not deposed during the four-month discovery period. Only two declarations, Jade Allen and Blakely Scott, were provided to Defendants after November 15, 2019. Defendants are clearly taking full advantage of the Court's extension until April 27, 2020, to do what they could, and should, have done last fall.⁷

C. Defendants' Request for Communications with Declarants

During the original fact discovery period, Defendants took issue with various of Plaintiffs' responses to Defendants' Requests for Production. For example, Defendants sent Plaintiffs a September 24, 2019, letter, totaling twenty-five pages, setting out their objections to Plaintiffs' responses. (Exh. 5). But at no time during the four-month fact discovery period did Defendants raise any issue

Holt, Antoinette Johnson, Willie Jones, Sarah Laurand, Isaac Mason, Galyalam Matz, Bulinda Moore, Keteria Neal, Raymond Parrott, Rebecca Payne, Tamara Phillips, Bradley Resler, Bradley Schlesinger, Marcus Soori-Arachi, Ayesha Terry, Eunice, Walden, Yujue Wang, Camille Williams, Nicholas Winbush, and Marian Wolfe.

⁶ Caroline Bailey, James Baiye, Michele Bassett, Mary Blasingame, Sydney Boyum, Rachel Elder, Margot Fumo, Olivia Haas, Dennis Hart, Colin Jackson, Natayla Kelly, Kristen Kemp, Gwen Lee, Dorothy Mize, Shaun Murray, Thires Pickett, Ofer Ravid, Shaila Sabush, Jordan Schuster, Elizabeth Talmadge, Sally Warren, Talisha Warren, and Michael White.

⁷ Defendants have expressed "concern" that they may not complete the depositions by the Court's deadline. (ECF No. 270 at 3). Given the facts, the Court should not countenance any request for additional time.

about Plaintiffs' production (or not) of communications with declarants even though Plaintiffs had not produced any communications with declarants.

The first time Defendants mentioned Plaintiffs' communications with the declarants was in a March 2, 2020, letter. (Exh. 6). In the letter, Defendants asked, "[f]or all Plaintiffs, please supplement responses to the following requests to produce copies of all communications with Plaintiffs' declarants." Defendants then listed the specific requests for each Plaintiff that they believed asked for communications between Plaintiffs and declarants. But, as detailed below, the request for supplementation was, in reality, a new request for production.

In their submission, ECF No. 284, Defendants point out that they asked some of the deposition witnesses whether they would produce their communications with Plaintiffs' counsel (and presumably with Plaintiffs). Some of the declarants, such as the two identified in an attachment to Defendants' Response, agreed. (ECF No. 284-1). But no deponent ever sent to Plaintiffs' counsel any documents the deponent agreed to produce.⁸

Defendants also cite to the deposition of Kelly Dermody, a San Francisco-based volunteer. Ms. Dermody served as a poll watcher on election day 2018, and

⁸ While it is not clear whether Defendants are asserting any wrongdoing by Plaintiffs' counsel, (*see* n. 2 "all of these emails already are sitting in their counsel's inboxes"), let there be no misunderstanding: Plaintiffs' counsel did not receive any document a deponent agreed at a deposition to produce.

Defendants cite her deposition as “revealing Plaintiffs’ counsel’s possession of responsive yet then-unproduced material,” which Defendants identify as “LBJ app data.” (ECF No. 284 at 3 n.4). Ms. Dermody’s deposition took place by telephone on October 29, 2019. That same day, during fact discovery and while both sides were producing documents, Plaintiffs produced LBJ app data, which apparently is what Defendants are terming “yet then-unproduced.” *See* Plaintiffs-FFA-3014.⁹ In fact, Ms. Dermody entered data in LBJ from her location in the field. As Defendants must now know, her entries are on lines 55, 57, 61, 64, 66, 70, 73, 77, 79, 1104, 1292, 1425, 1456, 1688, 1721, 1755, 1791, 1950, 2015, 2488, 3063, 3374, 3434, 3437, 3543, and 4215 of the November 6, 2018, sheet. If their complaint is that they did not have the spreadsheet when Ms. Dermody was deposed, Defendants certainly could have asked to reopen her deposition but never did.

More importantly, Defendants misunderstand LBJ. Contrary to their assertion in n.4, LBJ is not a document “which Plaintiffs, their attorneys, and pertinent nonparties used to log voter information Plaintiffs used in this case.”

⁹ Plaintiffs are not appending the document. It is an excel spreadsheet with six separate sheets, one of which has over 5000 lines of data across 30 columns. It would be near impossible to print for filing. In addition, it has been re-redacted to address Defendants’ complaints about the initial redaction but now contains data (personal identifying information) that would necessitate filing under seal. But, should the Court wish to see the exhibit, Plaintiffs would be pleased to make it available electronically.

Instead, as detailed in the Declaration of Elizabeth Conrad, Exh. 7, LBJ is a tool – basically a ticketing system - to track incoming complaints about voter suppression, difficulties voting, and other impediments to voting as well as calls asking for information. It is a real-time document that allows the simultaneous entry of complaints from the field, from a voter protection “hotline,” and from a boiler room—in this case from across the State of Georgia—and gives people at the Democratic Party headquarters, who are monitoring the incoming entries, the ability to respond in real time to observed systemic problems and one-off issues that can be addressed.¹⁰

II. Defendants’ Request Is Untimely.

Assuming for the sake of argument that Defendants in fact asked for, but did not receive, communications between Plaintiffs and declarants, they should have filed a timely Motion to Compel. The Court’s Amended Scheduling Order, ECF No. 79, said discovery was to open July 15, 2019, run for four months, and end November 15, 2019. At no time during that four months did Defendants raise the issue of Plaintiffs not having produced communications with declarants. That alone renders their request untimely. Under this Court’s Local Rules, “[u]nless ordered by the court, *a motion to compel a disclosure or discovery must be filed*

¹⁰ Seventy of the cells, across all six sheets, are redacted because counsel, after the election, entered comments in those cells. The seventy cells are out of a total of over a hundred thousand cells.

within the time remaining prior to the close of discovery or, if longer, within fourteen (14) days after service of the disclosure or discovery response upon which the objection is based.” LR 37.1(B), N.D. Ga. (emphasis added). Thus, Defendants needed to have filed a Motion to Compel by November 14, 2019.

Instead, Defendants now try to cast their request as one for supplementation. But a party is only required to supplement a response that was incomplete or incorrect in some material respect when made. Defendants have made no such showing. *See* ECF No. 271 at 7-8. *See also Robbins & Myers, Inc. v. J.M. Huber Corp.*, 274 F.R.D. 63, 76-77 (W.D.N.Y. 2011); *Sender v. Mann*, 225 F.R.D. 645, 654 (D. Colo. 2004). And, “[t]he obligation to supplement arises when the disclosing party reasonably should know that its prior discovery responses are incomplete.” *Jama v. City and County of Denver*, 304 F.R.D. 289, 299 (D. Colo. 2014). Regardless of how the Court views Defendants’ request, the request is untimely.

A. Defendants’ Request is a New Request, Not a Request for Supplementation.

One thing on which the Parties can agree is that Plaintiffs did not produce communications between any Plaintiff and any declarant. Plaintiffs appropriately read Defendants’ requests for production as not asking for those communications. Reinforcing Plaintiffs’ reading of the requests, it was not until long after the November 15, 2019, expiration of fact discovery that Defendants first took issue

with Plaintiffs not having produced communications with declarants. Having run out of time to move to compel production, Defendants phrased their request for these communications as a request for “supplementation” of Plaintiffs’ document production pursuant to Defendants’ earlier document requests rather than what it really is—a brand new document request made months after discovery closed.

Using the requests addressed to Fair Fight Action, Inc. as a reference point,¹¹ Defendants asked Fair Fight Action to supplement its responses to Requests to Produce 18, 20, 22-29, 31, 33, 37-40, 44, 47-56, 61-62, 65, and 71. Plaintiff Fair Fight Action’s responses to the Requests are appended as Exh. 8 and, as the Court will see, most of the Requests (Nos. 20, 22-29, 31, 33, 37-40, 44, 47-50, 53-55, 61, and 65) seek the production of all documents that “support your allegation that . . .” or “you claim support your allegation that. . .” or “you contend demonstrate. . .” or “you contend show. . .” or “you contend support. . .” Plaintiffs do not claim or contend that their communications with declarants support or show anything so those communications are non-responsive to the requests as Defendants chose to write them. Instead, it is the declarations

¹¹ It is only Defendants’ document requests to the non-Fair Fight Plaintiffs that ask for all “communications by you to any third party regarding this litigation.” *See, e.g.*, Exh. 9, Baconton Resp. to Def. RFP, no. 64. But no Plaintiff other than Fair Fight Action, Inc. has communicated with declarants about this litigation in anything other than general communications such as church bulletins and constant contact emails, making this request to the non-Fair Fight Plaintiffs irrelevant to the issues here.

themselves that support or show the facts alleged. Requests 51, 52, 56, and 62 focus on the identity of particular individuals, not communications with those individuals, and Plaintiffs produced the declarations and identified those individuals during the discovery period. One request (number 71) focuses on standing and thus does not implicate communications with declarants. Only one request even potentially calls for communications between declarants and Plaintiffs (number 33) and that request is limited to communications through November 18, 2018.¹² The last request, number 18, asks for “all documents that identify the alleged ‘discriminatory voting barriers reminiscent of the Jim Crow era.’” That request does not call for communications with declarants.

Defendants know how to word a request for all communications as opposed to a request for communications Plaintiffs claim or contend support their allegations. Defendants did so, for example, in their requests asking Plaintiffs for communications with the members and staff of the House Oversight and Reform Committee (Exh. 7 no. 5); for communications with the IRS about tax status (*id.* no. 12); for communications with the Lawyers Committee for Civil Rights (*id.* no. 35); and for communications with Common Cause (*id.* no. 36). But Defendants never made this kind of unqualified request for communications with declarants.

¹² Even if read to include a request for communications with declarants, the request is limited in time so there is no need for supplementation with any documents after November 2018.

Because Defendants' request for supplementation is a new request for production, the request is untimely.

B. Even If Not A New Request, The Supplementation Request Is Not Timely.

Defendants' argument that their supplementation request is timely hinges on their reading of this Court's February 11, 2020, Order (ECF No. 228) as an extension of all fact discovery. The Court's Order is not as Defendants claim.

Contrary to Defendants' reading, the Court's Order established March 2, 2020, as the close of fact discovery for the production of documents that were the subject of discovery disputes raised prior to November 15, 2019, the original fact discovery cut-off date. The Order did not re-open discovery on issues that had not been raised during the original fact discovery period.

III. CONCLUSION

Defendants' request for communications between Plaintiffs and the declarants is untimely. First, with a limited exception applicable to the non-Fair Fight Plaintiffs, Defendants' written discovery does not reach communications with the declarants. Second, prior to March 2, 2020, Defendants did not raise—in a letter, in an email, or in a meet-and-confer session—any concern that Plaintiffs had not produced communications with declarants. Third, Plaintiffs' counsel do not represent the declarants—as Defendants have known since they received the first declarations in February 2019—leaving defense counsel free to talk with and

subpoena the declarants to attend depositions and produce documents. Fourth, permissible discovery on Plaintiffs as to these communications ended November 15, 2019. For each of these reasons, the Court should deny Defendants' request for communications.

CERTIFICATE OF COMPLIANCE

I certify that this Reply was prepared using one of the font and point selections the Court has approve. *See* LR 5.51(C)(3).

This, the 3rd day of April, 2020.

/s/ Leslie J. Bryan

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 3rd day of April, 2020, I electronically filed the foregoing **PLAINTIFFS' REPLY TO DEFENDANTS' RESPONSE (ECF NO. 284) TO COURT'S QUESTIONS** 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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