

**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' MOTION TO EXCLUDE  
THE EXPERT TESTIMONY OF SEAN P. TRENDE**

In accordance with *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579, 589 (1993); Federal Rule of Evidence 702; Local Rule of the Northern District of Georgia 26.2C; and this Court's Second Amended Scheduling Order (ECF No. 228), Plaintiffs hereby move the Court to exclude the opinions of defense expert Sean P. Trende. As grounds for this motion, and as more fully set out in the accompanying memorandum of law, Mr. Trende's opinions are due to be excluded because he is not qualified and, even if the Court were to determine he had

adequate qualifications, he has failed to apply a reliable methodology in reaching his conclusions, and those conclusions will not be helpful to the Court as trier of fact.

**CERTIFICATE OF COUNSEL REGARDING FONT SIZE**

I hereby certify that the foregoing has been prepared with a font size and point selection (Times New Roman, 14 pt.) which is approved by the Court pursuant to Local Rules 5.1(C) and 7.1(D).

Respectfully submitted, this, the 29th day of June, 2020.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>th</sup> day of June, 2020, I caused to be served the foregoing **PLAINTIFFS' MOTION TO EXCLUDE THE EXPERT TESTIMONY OF SEAN P. TRENDE AND MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION** by filing it through the Court's ECF system, which will serve the following counsel:

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This, the 29th day of June, 2020.

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