

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

THE NEW GEORGIA PROJECT,  
REAGAN JENNINGS, CANDACE  
WOODALL, and BEVERLY PYNE,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official  
capacity as the Georgia Secretary of State  
and the Chair of the Georgia State Election  
Board, *et al.*

Defendants.

Civil Action File  
No. 1:20-CV-01986-ELR

**DECLARATION OF KEVIN J. HAMILTON IN SUPPORT OF  
PLAINTIFFS' REPLY IN SUPPORT OF THEIR MOTION FOR  
PRELIMINARY INJUNCTION**

I, Kevin J. Hamilton, hereby declare as follows:

1. I am over the age of 18 and competent to make this declaration. I am a partner with the law firm Perkins Coie LLP, am admitted to practice law in the State of Washington and before the Supreme Court of the United States and multiple federal courts of appeals and district courts. I am admitted in this District *pro hac vice* in the above-captioned matter, and I am attorney for Plaintiffs. I submit this declaration to provide the Court true and correct copies of certain documents

submitted in support of Plaintiffs' Reply in Support of Their Motion for Preliminary Injunction.

2. **Exhibit 1** is a true and correct copy of the rebuttal expert report of Dr. Kenneth Mayer of the University of Wisconsin, dated July 16, 2020.

3. **Exhibit 2** is a true and correct copy of the supplemental expert report of Dr. Robert T. Ball, Jr. of the Medical University of South Carolina, dated July 16, 2020.

4. **Exhibit 3** is a true and correct copy of the supplemental declaration of Beverly Pyne, dated July 14, 2020.

5. **Exhibit 4** is a true and correct copy of the declaration of Marsha Albert, dated July 7, 2020.

6. **Exhibit 5** is a true and correct copy of the supplemental declaration of Nse Ufot, Chief Executive Officer of The New Georgia Project, dated July 16, 2020.

7. **Exhibit 6** is a true and correct copy of the declaration of Kylah Mason, dated July 10, 2020.

8. **Exhibit 7** is a true and correct copy of the declaration of Laurie Mallis, dated July 2, 2020.

9. **Exhibit 8** is a true and correct copy of the declaration of Rashida Williamson, dated July 15, 2020.

10. **Exhibit 9** is a true and correct copy of the declaration of Kelly Williams, dated July 15, 2020.

11. **Exhibit 10** is a true and correct copy of the declaration of Jeffrey Wright, dated June 14, 2020.

12. **Exhibit 11** is a true and correct copy of the declaration of Gabriel Etienne, dated July 15, 2020.

13. **Exhibit 12** is a true and correct copy of the declaration of Ross Barnard, dated July 1, 2020.

14. **Exhibit 13** is a true and correct copy of the declaration of Joseph Bellon, dated July 2, 2020.

15. **Exhibit 14** is a true and correct copy of the declaration of Chelsea Calhoun, dated June 23, 2020.

16. **Exhibit 15** is a true and correct copy of the declaration of Warren Cantrelle, dated June 29, 2020.

17. **Exhibit 16** is a true and correct copy of the declaration of Victoria Clark, dated June 26, 2020.

18. **Exhibit 17** is a true and correct copy of the declaration of Josh Cornelius, dated July 2, 2020.

19. **Exhibit 18** is a true and correct copy of the declaration of Aubrey Cyphert, dated July 3, 2020.

20. **Exhibit 19** is a true and correct copy of the declaration of Sarah Draut, dated July 7, 2020.

21. **Exhibit 20** is a true and correct copy of the declaration of Kenneth Michael Dupont, dated July 3, 2020.

22. **Exhibit 21** is a true and correct copy of the declaration of Julianna Eidle, dated June 30, 2020.

23. **Exhibit 22** is a true and correct copy of the declaration of John Fee, dated June 22, 2020.

24. **Exhibit 23** is a true and correct copy of the declaration of Hannah Fleischmann, dated June 28, 2020.

25. **Exhibit 24** is a true and correct copy of the declaration of Aimee Franz, dated June 26, 2020.

26. **Exhibit 25** is a true and correct copy of the declaration of Courtney Garvin, dated June 14, 2020.

27. **Exhibit 26** is a true and correct copy of the declaration of Todd Goldfarb, dated June 30, 2020.

28. **Exhibit 27** is a true and correct copy of the declaration of Erica Gonzalez, dated July 3, 2020.

29. **Exhibit 28** is a true and correct copy of the declaration of Cornelio Adams, dated June 11, 2020.

30. **Exhibit 29** is a true and correct copy of the declaration of William (Bill) Frazier Aitkenhead, dated July 2, 2020.

31. **Exhibit 30** is a true and correct copy of the declaration of Brian David, dated June 21, 2020.

32. **Exhibit 31** is a true and correct copy of the declaration of Sada Baby, dated June 29, 2020.

33. **Exhibit 32** is a true and correct copy of the declaration of Carol Ansley, dated June 24, 2020.

34. **Exhibit 33** is a true and correct copy of the declaration of Jennifer Bae, dated June 26, 2020.

35. **Exhibit 34** is a true and correct copy of the declaration of Daniel Arsura, dated June 24, 2020.

36. **Exhibit 35** is a true and correct copy of the declaration of Emily Bishko, dated June 29, 2020.

37. **Exhibit 36** is a true and correct copy of the declaration of Allison Hall, dated July 2, 2020.

38. **Exhibit 37** is a true and correct copy of the declaration of Heath Hall, dated June 28, 2020.

39. **Exhibit 38** is a true and correct copy of the declaration of Sara Hammock, dated July 1, 2020.

40. **Exhibit 39** is a true and correct copy of the declaration of Bonita Hazzard, dated June 29, 2020.

41. **Exhibit 40** is a true and correct copy of the declaration of Stanley Herman, dated July 2, 2020.

42. **Exhibit 41** is a true and correct copy of the declaration of Jennica Hill, dated June 11, 2020.

43. **Exhibit 42** is a true and correct copy of the declaration of Ann Jordan, dated June 17, 2020.

44. **Exhibit 43** is a true and correct copy of the declaration of John Jupin, dated June 14, 2020.

45. **Exhibit 44** is a true and correct copy of the declaration of Marilyn Kelman, dated July 3, 2020.

46. **Exhibit 45** is a true and correct copy of the declaration of Arielle Klebanoff, dated June 26, 2020.

47. **Exhibit 46** is a true and correct copy of the declaration of Emily Koivu, dated June 23, 2020.

48. **Exhibit 47** is a true and correct copy of the declaration of Tracie Marlow, dated June 28, 2020.

49. **Exhibit 48** is a true and correct copy of the declaration of Marjorie Martin, dated June 25, 2020.

50. **Exhibit 49** is a true and correct copy of the declaration of Lori Krugman, dated July 14, 2020.

51. **Exhibit 50** is a true and correct copy of the declaration of Paul Olson, dated July 2, 2020.

52. **Exhibit 51** is a true and correct copy of the declaration of Pamela Perkowski, dated June 22, 2020.

53. **Exhibit 52** is a true and correct copy of the declaration of Sarah Perry, dated June 19, 2020.

54. **Exhibit 53** is a true and correct copy of the declaration of Joseph Perry, dated June 19, 2020.

55. **Exhibit 54** is a true and correct copy of the declaration of Tabatha Phillips, dated July 1, 2020.

56. **Exhibit 55** is a true and correct copy of the declaration of Rachael Platt, dated July 2, 2020.

57. **Exhibit 56** is a true and correct copy of the declaration of Arielle Pool, dated July 2, 2020.

58. **Exhibit 57** is a true and correct copy of the declaration of Jennifer Prindiville, dated July 6, 2020.

59. **Exhibit 58** is a true and correct copy of the declaration of Jesse A. Rosen, dated July 4, 2020.

60. **Exhibit 59** is a true and correct copy of the declaration of Benjamin Scholes, dated June 25, 2020.

61. **Exhibit 60** is a true and correct copy of the declaration of Chadwick Boyd, dated July 14, 2020.

62. **Exhibit 61** is a true and correct copy of the declaration of Natasha Stark, dated July 2, 2020.

63. **Exhibit 62** is a true and correct copy of the declaration of Samuel Steele, dated June 29, 2020.



64. **Exhibit 63** is a true and correct copy of the declaration of Ben Sutton, dated July 8, 2020.

65. **Exhibit 64** is a true and correct copy of the declaration of Leah Tennille, dated June 24, 2020.

66. **Exhibit 65** is a true and correct copy of the declaration of Howard Wexler, dated June 18, 2020.

67. **Exhibit 66** is a true and correct copy of the declaration of Flavia Costa, dated July 5, 2020.

68. **Exhibit 67** is a true and correct copy of the declaration of Sheila Samuels, dated June 7, 2020.

69. **Exhibit 68** is a true and correct copy of the declaration of Joseph Brock, Jr., dated June 8, 2020.

70. **Exhibit 69** is a true and correct copy of the declaration of Keosha Williams, dated July 6, 2020.

71. **Exhibit 70** is a true and correct copy of the declaration of Shea Embry, dated June 28, 2020.

72. **Exhibit 71** is a true and correct copy of the declaration of Diane Feeney, dated June 17, 2020.

73. **Exhibit 72** is a true and correct copy of the declaration of Marci Adilman, dated July 2, 2020.

74. **Exhibit 73** is a true and correct copy of the declaration of Dustin Hills, dated June 28, 2020.

75. **Exhibit 74** is a true and correct copy of the declaration of Judith Horowitz, dated July 1, 2020.

76. **Exhibit 75** is a true and correct copy of the declaration of Stephen Dilts, dated July 1, 2020.

77. **Exhibit 76** is a true and correct copy of the declaration of Felicia Jones-Shaw, dated June 28, 2020.

78. **Exhibit 77** is a true and correct copy of the declaration of Ann Louis, dated July 10, 2020.

79. **Exhibit 78** is a true and correct copy of the declaration of Barrie Ramsey-Mark, dated July 10, 2020.

80. **Exhibit 79** is a true and correct copy of the declaration of Ethelena Cummings Willis, dated July 1, 2020.

81. **Exhibit 80** is a true and correct copy of the declaration of Kenneth Menefee, dated July 10, 2020.

82. **Exhibit 81** is a true and correct copy of the declaration of Melbourne Treco, dated July 2, 2020.

83. **Exhibit 82** is a true and correct copy of the declaration of Sean Rauls, dated July 11, 2020.

84. **Exhibit 83** is a true and correct copy of the declaration of Denice Rios Mojica, dated July 13, 2020.

85. **Exhibit 84** is a true and correct copy of the declaration of Meredith Graves, dated June 29, 2020.

86. **Exhibit 85** is a true and correct copy of the declaration of Alexandra Lampert, dated July 9, 2020.

87. **Exhibit 86** is a true and correct copy of the declaration of Scott O. Konopasek, dated July 14, 2020.

88. **Exhibit 87** is a true and correct copy of the declaration of Stephanie Bolton, dated July 2, 2020.

89. **Exhibit 88** is a true and correct copy of the declaration of Vanessa Caneron, dated June 17, 2020.

90. **Exhibit 89** is a true and correct copy of the declaration of Julianne Garner, dated June 4, 2020.

91. **Exhibit 90** is a true and correct copy of the declaration of Aleia Daniel, dated June 14, 2020.

92. **Exhibit 91** is a true and correct copy of the declaration of Phylis Alford, dated June 29, 2020.

93. **Exhibit 92** is a true and correct copy of the declaration of Lula Hutchinson, dated June 30, 2020.

94. **Exhibit 93** is a true and correct copy of the declaration of Kimberly Moten, dated June 30, 2020.

95. **Exhibit 94** is a true and correct copy of the declaration of Shalandra Ware Brown, dated July 2, 2020.

96. **Exhibit 95** is a true and correct copy of the declaration of Jessica Barrientos, dated June 9, 2020.

97. **Exhibit 96** is a true and correct copy of the declaration of Pamela Edison, dated June 30, 2020.

98. **Exhibit 97** is a true and correct copy of the declaration of John W. Kastelic, dated July 2, 2020.

99. **Exhibit 98** is a true and correct copy of the declaration of Jamel Morris-Barclay, dated July 13, 2020.

100. **Exhibit 99** is a true and correct copy of the Order in *League of Women Voters of NH v. Gardner*, No. 226-2017-CV-00433 (NH Sup. Ct. April 9, 2020).

101. **Exhibit 100** is a true and correct copy of USPS Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center Service Area.

102. **Exhibit 101** is a true and correct copy of a May 29, 2020 USPS letter regarding Election Mail.

103. **Exhibit 102** is a true and correct copy of the declaration of Brenda Louis Jackson, dated July 15, 2020.

Dated: July 16, 2020

By: **Kevin J. Hamilton**

Kevin J. Hamilton\*

**PERKINS COIE LLP**

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: (206) 359-8000

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KHamilton@perkinscoie.com

*Counsel for Plaintiffs*

*\*Admitted Pro Hac Vice*

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of L.R. 5.1, using font type of Times New Roman and a point size of 14.

Dated: July 16, 2020

**Adam M. Sparks**  
*Counsel for Plaintiffs*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 16, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: July 16, 2020

**Adam M. Sparks**  
*Counsel for Plaintiffs*