

No. 20-14480

---

**In the United States Court of Appeals  
for the Eleventh Circuit**

---

CORECO JA'QAN PEARSON, ET AL.,  
*Plaintiffs-  
Appellants/Petitioners,*

v.

BRIAN KEMP, ET AL.,  
*Defendants-  
Appellees/Respondents*

---

On Certified Order from the United States District Court  
for the Northern District of Georgia, Atlanta Division,  
No. 1:20-cv-04809-TCB

---

**MOTION FOR LEAVE TO FILE CORRECTED**

**BRIEF OUT OF TIME**

John M. Reeves  
REEVES LAW LLC  
3703 Watson Road  
St. Louis, MO 63109  
(314) 775-6985  
[reeves@reeveslawstl.com](mailto:reeves@reeveslawstl.com)  
*Application for admission to  
the Eleventh Circuit pending.*

Sidney Powell  
*Counsel of Record*  
SIDNEY POWELL PC  
2911 Turtle Creek Blvd., Suite 300  
Dallas, TX 75219  
(214) 717-1775  
[sidney@federalappeals.com](mailto:sidney@federalappeals.com)

L. Lin Wood  
L. LIN WOOD, P.C.  
P.O. Box 52584  
Atlanta, GA 30305-0584  
(404) 891-1402

[lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

Harry W. MacDougald  
CALDWELL, PROPST & DELOACH, LLP  
Two Ravinia Drive, Suite 1600  
Atlanta, GA 30346  
(404) 843-1956

Howard Kleinhendler  
HOWARD KLEINDLER ESQUIRE  
369 Lexington Avenue, 12th Floor  
New York, NY 10017  
(917) 793-1188

*Counsel for Plaintiffs-Appellants*

## CERTIFICATE OF INTERESTED PARTIES

Batten, Sr., Hon. Timothy C., U.S. District Court Judge,

Beane, Amanda J., Counsel for Proposed Intervenors Democratic Party  
of Georgia, *et al.*,

Caldwell, Propst & DeLoach, LLP, Counsel for Plaintiffs- Appellants,

Callais, Amanda R., Counsel for Proposed Intervenors Democratic Party  
of Georgia, *et al.*,

Carr, Christopher M., Attorney General, Counsel for Defendants-  
Appellees,

Carroll, James K., Plaintiff-Appellant, Consiglio, Vikki T., Plaintiff-  
Appellant,

Democratic Party of Georgia, Inc., Proposed Intervenor, DCCC, Proposed  
Intervenor,

DSCC, Proposed Intervenor,

Elias, Marc E., Counsel for Proposed Intervenors Democratic Party of  
Georgia, *et al.*,

Fisher, Carolyn H., Plaintiff-Appellant, Godwin, Gloria K., Plaintiff-  
Appellant,

Haller, Julia Z., Counsel for Plaintiffs-Appellants,

Hamilton, Kevin J., Counsel for Proposed Intervenors Democratic Party  
of Georgia, *et al.*,

Kemp, Brian P., Governor of Georgia, Defendant-Appellee,

Kleinhendler, Howard, Counsel for Plaintiffs-Appellants,

Krevolin and Horst, LLC, Counsel for Proposed Intervenors

Democratic Party of Georgia, *et al.*, Latham, Cathleen A., Plaintiff-  
Appellant,

Le, Ahn, Matthew, State Election Board member, Defendant- Appellee,

MacDougald, Harry W., Counsel for Plaintiffs-Appellants,

Mashburn, Matthew, State Election Board member, Defendant-  
Appellee,

McGowan, Charlene S., Assistant Attorney General, Counsel for  
Defendants-Appellees,

Mertens, Matthew J., Counsel for Proposed Intervenors Democratic  
Party of Georgia, *et al.*,

Pearson, Coreco J., Plaintiff-Appellant,

Perkins Coie LLP, Counsel for Proposed Intervenors Democratic Party  
of Georgia, *et al.*,

Powell, Sidney, Counsel for Plaintiffs-Appellants,

Raffensperger, Brad, Georgia Secretary of State, Defendant-Appellee,  
Reeves, John M., Counsel for Appellants-Plaintiffs,  
Sparks, Adam M., Counsel for Proposed Intervenors Democratic Party of  
Georgia, *et al.*,  
Sullivan, Rebecca N., Vice Chair of the State Election Board,  
Defendant-Appellee,  
Van Gundy, Brian J., Plaintiff-Appellant,  
Webb, Bryan K., Deputy Attorney General, Counsel for Defendants-  
Appellees,  
Willard, Russell D., Senior Assistant Attorney General, Counsel for  
Defendants-Appellees,  
Wood, Jr., L. Lin, Counsel for Plaintiffs-Appellants,  
Worley, David J., State Election Board member, Defendant/Appellee.

No. 20-14480

---

In the United States Court of Appeals  
for the Eleventh Circuit

---

CORECO JA'QAN PEARSON, ET AL.,  
*Plaintiffs-*  
*Appellants/Petitioners,*

v.

BRIAN KEMP, ET AL.,  
*Defendants-*  
*Appellees/Respondents*

---

On Certified Order from the United States District Court  
for the Northern District of Georgia, Atlanta Division,  
No. 1:20-cv-04809-TCB

---

**MOTION FOR LEAVE TO FILE CORRECTED**

**BRIEF OUT OF TIME**

In the interest of justice, Plaintiffs/Appellants/Petitioners respectfully request leave of court to file their original and corrected briefs out of time. The brief in response to questions on jurisdiction by this Court and for Permission to Appeal was due by midnight last night. Counsel for Plaintiffs are a small team handling multiple significant cases in four states—in two of which—Arizona and Michigan—counsel had hearings yesterday in addition to multiple briefs and responses due.

In addition, counsel had internet and computer problems that delayed our communications, in addition to what can only be called “operator errors” by lead counsel late night that caused the omission of the list of authorities and a substantive misstatement thoughtfully identified by CNBC this morning, which the contemporaneously filed brief corrects. The Dominion machines flipped votes from President Trump to Mr. Biden (not the reverse). Those errors are corrected in the brief filed with this motion.

Counsel apologizes to the Court and opposing counsel for the delay and the errors. We appreciate the Court’s expedited consideration of this matter important to the nation and the State of Georgia.

John M. Reeves  
REEVES LAW LLC  
3703 Watson Road  
St. Louis, MO 63109  
(314) 775-6985  
[reeves@reeveslawstl.com](mailto:reeves@reeveslawstl.com)  
*Application for admission to  
the Eleventh Circuit pending.*

Respectfully submitted

*/s/ Sidney Powell*  
Sidney Powell  
*Counsel of Record*  
SIDNEY POWELL PC  
2911 Turtle Creek Blvd., Suite 300  
Dallas, TX 75219  
(214) 717-1775  
[sidney@federalappeals.com](mailto:sidney@federalappeals.com)

L. Lin Wood  
L. LIN WOOD, P.C.  
P.O. Box 52584  
Atlanta, GA 30305-0584

Harry W. MacDougald  
CALDWELL, PROPST & DELOACH,  
LLP

Two Ravinia Drive, Suite 1600  
Atlanta, GA 30346  
(404) 843-1956  
[hmacdougald@cpdlawyers.com](mailto:hmacdougald@cpdlawyers.com)

(404) 891-1402  
[lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

Howard Kleinhendler  
HOWARD KLEINDLER ESQUIRE  
369 Lexington Avenue, 12th Floor  
New York, NY 10017  
(917) 793-1188  
[howard@kleinhendler.com](mailto:howard@kleinhendler.com)

*Counsel for Plaintiffs-Appellants*

## CERTIFICATE OF SERVICE

I hereby certify that on **December 3, 2020**, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Eleventh Circuit by using the CM/ECF system.

A true and correct copy of the foregoing will be emailed to the following counsel:

Charlene S. McGowan  
[cmcgowan@law.ga.gov](mailto:cmcgowan@law.ga.gov)  
Russell D. Willard  
[rwillard@law.ga.gov](mailto:rwillard@law.ga.gov)

[Corey Miller](#)

*Counsel for Defendants Brian Kemp, Brad Raffensperger, David J. Worley, Rebecca N. Sullivan, Matthew Mashburn, and Anh Le.*

Adam M. Sparks  
[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)  
Halsey G. Knapp, Jr.  
[hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com)  
Susan P. Coppedge  
[coppedge@khlawfirm.com](mailto:coppedge@khlawfirm.com)  
Adam M. Sparks  
[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)

*Counsel for Proposed Intervenor-Defendants  
Democratic Party of Georgia, Inc., DSCC, and DCCC.*

*/s/ Sidney Powell*

## Certificate of Compliance

I certify under Fed. R. App. P. 5(c)(1) that this petition contains \*\*\*\*\* words, excluding those parts exempted under Fed. R. App. P. 32(f). I further that certify this brief complies with type-volume limitations under Fed. R. App. P. 32(g) as it is written in proportionally-spaced, 14-point Century font using Microsoft Office Word.

*/s/ Sidney Powell*