

Mackie, Caroline P.

From: Farr, Thomas A. <thomas.farr@ogletreedeakins.com>
Sent: December 21, 2015 4:23 PM
To: Speas, Edwin M.; Peters, Alec
Cc: Anita Earls; Allison Riggs; astein@tinfulton.com; Mackie, Caroline P.; O'Hale, John W.
Subject: RE: Covington: Steve Ansolabehere

You can hereby consider our designations as amended.

Thomas A. Farr | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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thomas.farr@ogletreedeakins.com | www.ogletreedeakins.com | [Bio](#)

From: Speas, Edwin M. [mailto:ESpeas@poynerspruill.com]
Sent: Monday, December 21, 2015 4:21 PM
To: Farr, Thomas A.; Peters, Alec
Cc: Anita Earls; Allison Riggs; astein@tinfulton.com; Mackie, Caroline P.; O'Hale, John W.
Subject: RE: Covington: Steve Ansolabehere

Tom, as you did not designate either Burden or Ansolabehere as experts in this case we will oppose any effort to take their depositions. Thanks. Eddie

From: Farr, Thomas A. [mailto:thomas.farr@ogletreedeakins.com]
Sent: December 21, 2015 4:05 PM
To: Speas, Edwin M.; Peters, Alec
Cc: Anita Earls; Allison Riggs; astein@tinfulton.com; Mackie, Caroline P.; O'Hale, John W.
Subject: RE: Covington: Steve Ansolabehere

Thanks Eddie. We will be noticing him and Burden for depositions and will let you know of the dates.

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From: Speas, Edwin M. [mailto:ESpeas@poynerspruill.com]
Sent: Monday, December 21, 2015 3:40 PM
To: Farr, Thomas A.; Peters, Alec
Cc: Anita Earls; Allison Riggs; astein@tinfulton.com; Mackie, Caroline P.; O'Hale, John W.
Subject: Covington: Steve Ansolabehere

Tom,

Thanks for informing me on 12/16/15 that defendants in *Covington* plan to offer a part of the expert testimony of Dr. Steve Ansolabehere in *Harris* in *Covington*. For the same reasons plaintiffs in *Harris* opposed your effort to use the expert testimony of Dr. Burden in the Voter ID cases in *Harris*, plaintiffs in *Covington* will oppose your effort to offer the expert testimony of Dr. Ansolabehere in *Harris* in *Covington*.

Eddie

Exhibit A

Edwin Marion Speas, Jr. | Partner

Poyner Spruill^{LLP}

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