

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

ALPHA PHI ALPHA FRATERNITY
INC., et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER,

Defendant.

CIVIL ACTION

FILE NO. 1:21-CV-05337-SCJ

COAKLEY PENDERGRASS, et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

FILE NO. 1:21-CV-05339-SCJ

ANNIE LOIS GRANT, et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

FILE NO. 1:22-CV-00122-SCJ

DEFENDANTS' LISTS OF WITNESSES AND EXHIBITS

On January 28, 2022, this Court directed that the parties in the above-captioned cases were to file lists of witnesses and exhibits for the upcoming preliminary injunction hearing. Defendants provide the following lists:

1. List of witnesses who are expected to testify live at the preliminary injunction hearing.

Defendants plan to call the following individuals to testify live at the preliminary injunction hearing:

1. Mr. John Morgan, expert witness on mapdrawing and demographics.
2. Mr. Michael Barnes, witness on Secretary of State processes surrounding election administration.
3. Ms. Lynn Bailey, expert witness on county election processes and timing.
4. Ms. Gina Wright, expert and fact witness on mapdrawing and demographics.
5. Dr. John Alford, expert witness on polarized voting issues.

Defendants plan to cross-examine the following witnesses who provided declarations for Plaintiffs at the hearing and reserve the right to cross-examine additional witnesses called by Plaintiffs:

1. William Cooper
2. Lisa Handley

3. Adrienne Jones
4. Blakeman Esselstyn
5. Maxwell Palmer
6. Orville Vernon Burton

2. List of witnesses who are expected to testify by affidavit.

Defendants do not have any additional witnesses who are expected to testify only by affidavit.

3. Numbered list of exhibits.

Defendants identify the following exhibits for use at the hearing and indicate whether they have been previously submitted. Exhibits that were not previously submitted are attached to this pleading.

Number	Exhibit	Submitted?
001	Dec. of John Morgan - Alpha Phi Alpha	Already filed on docket
002	Dec. of John Morgan - Grant	Already filed on docket
003	Dec. of John Morgan - Pendergrass	Already filed on docket
004	Dec. of Michael Barnes	Already filed on docket
005	2021 Senate committee guidelines	Already filed on docket
006	2021 House committee guidelines	Already filed on docket
007	SOS Redistricting Manual	Not previously submitted
008	2022 SOS Election Calendar	Already filed on docket
009	Adopted Congressional Map Packet	Not previously submitted
010	Adopted Senate Map Packet	Not previously submitted
011	Adopted House Map Packet	Not previously submitted

012	Democratic Congressional Map Packet	Not previously submitted
013	Democratic Senate Map Packet	Not previously submitted
014	Democratic House Map Packet	Not previously submitted
015	Cooper House District 28	Not previously submitted
016	Cooper House District 129	Not previously submitted
017	Cooper House Districts 128 and 158	Not previously submitted
018	Esselstyn House Districts 74, 75, and 78	Not previously submitted
019	Esselstyn House Districts 133 and 135	Not previously submitted
020	Esselstyn House District 149	Not previously submitted
021	Cooper Senate District 18	Not previously submitted
022	Cooper Senate Districts 23 and 26	Not previously submitted
023	Cooper Senate Districts 16, 28, and 29	Not previously submitted
024	Esselstyn Senate District 17	Not previously submitted
025	Esselstyn Senate District 20	Not previously submitted
026	Esselstyn Senate District 23	Not previously submitted
027	Cooper Congress District 14	Not previously submitted
028	Adopted House District 32	Not previously submitted
029	Adopted House Districts 74, 75, and 78	Not previously submitted
030	Adopted House District 118	Not previously submitted
031	Adopted House Districts 149	Not previously submitted
032	Adopted House Districts 135 and 144	Not previously submitted
033	Adopted House Districts 128, 155, and 158	Not previously submitted
034	Adopted Senate District 18	Not previously submitted
035	Adopted Senate Districts 23 and 26	Not previously submitted
036	Adopted Senate Districts 28 and 16	Not previously submitted
037	Adopted Congress District 14	Not previously submitted

Defendants reserve the right to mark additional exhibits during the hearing if required for the resolution of the motions.

This 31st day of January, 2022.

Respectfully submitted,

Christopher M. Carr
Attorney General
Georgia Bar No. 112505
Bryan K. Webb
Deputy Attorney General
Georgia Bar No. 743580
Russell D. Willard
Senior Assistant Attorney General
Georgia Bar No. 760280
Charlene McGowan
Assistant Attorney General
Georgia Bar No. 697316
State Law Department
40 Capitol Square, S.W.
Atlanta, Georgia 30334

/s/ Bryan P. Tyson
Bryan P. Tyson
Special Assistant Attorney General
Georgia Bar No. 515411
btyson@taylorenghish.com
Frank B. Strickland
Georgia Bar No. 678600
fstrickland@taylorenghish.com
Bryan F. Jacoutot
Georgia Bar No. 668272
bjacoutot@taylorenghish.com
Loree Anne Paradise
Georgia Bar No. 382202
lparadise@taylorenghish.com

Taylor English Duma LLP

1600 Parkwood Circle

Suite 200

Atlanta, Georgia 30339

(678) 336-7249

Counsel for Defendants

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned certifies that the foregoing brief has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan P. Tyson
Bryan P. Tyson