

EXHIBIT B

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

COAKLEY PENDERGRASS, et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

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

**DEFENDANT STATE ELECTION BOARD MEMBERS' OBJECTIONS
AND RESPONSES TO PLAINTIFFS' FIRST SET OF
INTERROGATORIES**

Defendants William S. Duffey Jr., in his official capacity as Chair of the State Election Board; and Matthew Mashburn, Sara Tindall Ghazal, Edward Lindsey, and Janice Johnston, in their official capacity as members of the State Election Board (collectively, "Defendants"), file these objections and responses to Plaintiffs' First Set of Interrogatories. The answers provided are based on each member's personal knowledge about the subject matter of the interrogatory posed. Defendants state they have not been and are not involved or knowledgeable about the redistricting process in any upcoming election.

**SPECIFIC OBJECTIONS AND RESPONSES TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Interrogatory No. 1:

Identify all persons whom you know or have any reason to believe have

any knowledge about the allegations in the Complaint or the allegations and affirmative defenses in the Answer, and with respect to each individual, state with specificity the substance and basis of their knowledge.

Response No. 1:

Defendants do not know the individuals who have knowledge of the allegations of the Complaint and Answer because they were not involved in the mapdrawing process and do not know who provided information about the allegations of the Complaint.

Interrogatory No. 2:

Identify all state interests, policies, or other justifications you contend are served by or underlie SB 2EX, including but not limited to any state interests, policies, or other justifications cited by you in your motion to dismiss the Complaint, *see* ECF No. 38; your response in opposition to Plaintiffs' motion for preliminary injunction, *see* ECF No. 40; your reply in support of your motion to dismiss, *see* ECF No. 44; your proposed findings of fact and conclusions of law, *see* ECF No. 88; and the Answer.

Response No. 2:

Defendants do not have information regarding those state interests, policies, or justifications, other than those included in their prior filings, including because they were not involved in the mapdrawing process and are not aware of all state interests that may have been considered by the General

Assembly in drawing districts for any specific election.

Interrogatory No. 3:

Identify the current residential addresses of all members of Georgia's delegation to the U.S. House of Representatives.

Response No. 3:

Defendants do not know the current residential addresses of the members of the Georgia congressional delegation.

Interrogatory No. 4:

Identify the latest date by which you believe statewide districting plans (including state legislative and congressional maps) must be in place in advance of the 2024 primary elections, including any specific deadlines, requirements, or other reasons justifying this determination. Alternatively, if the date of the 2024 primary elections has not been finalized at the time these interrogatories are propounded, state the minimum number of days in advance of the 2024 primary elections that you believe statewide districting plans must be in place, including any specific deadlines, requirements, or other reasons justifying this determination.

Response No. 4:

Defendants object to the concluding language of the interrogatory which states "including any specific deadlines, requirements, or other reasons

justifying this determination” on the grounds this part of the interrogatory is vague and uncertain, and thus incapable of a response.

Subject to this objection, Defendants do not know the date by which districting plans must be in place for the 2024 election and do not have any belief about the minimum number of days in advance of the 2024 primary elections within which districting plans must be in place.

Interrogatory No. 5:

Identify all communications you have had with the General Assembly, any members of Georgia’s delegation to the U.S. House of Representatives or their staffs, any candidates for election to the U.S. House of Representatives or their staffs, or Governor Brian Kemp or his staff regarding SB 2EX, the allegations in the Complaint, the allegations and affirmative defenses in the Answer, or this litigation.

Response No. 5:

Defendants are not and were not involved in the redistricting process and have not had any conversations with the General Assembly, Governor Brian Kemp, or his staff regarding SB 2EX, the allegations in the Complaint, the allegations and affirmative defenses in the Answer, or this litigation.

Interrogatory No. 6:

Identify each person participating in the preparation of responses to these interrogatories, and for each person listed, state with specificity the

substance and basis of their knowledge.

Response No. 6:

Defendants state that the following individuals participated in preparation of these interrogatories:

1. William S. Duffey Jr., Chair of the State Election Board and, as the interrogatory answers state, he does not have information responsive to the interrogatories.
2. Sara Tindall Ghazal, member of the State Election Board, and, as the interrogatory answers state, she does not have information responsive to the interrogatories.
3. Janice Johnston, member of the State Election Board, and, as the interrogatory answers state, she does not have information responsive to the interrogatories.
4. Edward Lindsey, member of the State Election Board, and, as the interrogatory answers state, he does not have information responsive to the interrogatories.
5. Matthew Mashburn, member of the State Election Board, and, as the interrogatory answers state, he does not have information responsive to the interrogatories.
6. Counsel for Defendants, who formatted and helped administratively prepare these responses.

This 9th day of September, 2022.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2022, I caused a copy of the foregoing to be served by electronic mail on all counsel of record.

/s/ Bryan P. Tyson

Bryan P. Tyson

Counsel for Defendants