

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

COAKLEY PENDERGRASS et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as the Georgia
Secretary of State, et al.,

Defendants.

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

ANNIE LOIS GRANT et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as the Georgia
Secretary of State, et al.,

Defendants.

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

**JOINT MOTION TO EXTEND DISCOVERY DEADLINE FOR
LIMITED PURPOSE OF TAKING DEPOSITIONS**

The Parties¹ hereby jointly move for entry of an order extending the discovery deadline in the above-captioned cases through and including March 9,

¹ In the interest of judicial economy, the Parties submit this motion and stipulation in each of the two above-captioned cases, reflecting agreement between counsel for all parties in *Pendergrass v. Raffensperger*, No. 1:21-CV-

2023 for the limited purpose of conducting the specific depositions as stipulated herein. In support of this Joint Motion, the Parties respectfully show the Court the following:

1. Discovery in the above-captioned cases is set to expire on February 17, 2023.

2. Good cause supporting this Motion for extension of time exists because the Parties have diligently pursued discovery and mutually agree that a limited extension to the discovery deadline is necessary to take the following depositions as agreed by the parties:

a. The Parties have agreed that the deposition of former Representative Derrick Jackson shall take place on February 20, 2023.

b. The Parties have agreed that the deposition of Dr. Loren Collingwood shall take place on February 21, 2023.

c. The Parties have agreed that the deposition of former Representative Erick Allen shall take place on February 21, 2023.

- d. The Parties have agreed that the deposition of Fenika Miller shall take place on February 21, 2023.
- e. The Parties have agreed that the deposition of Dr. Maxwell Palmer shall take place on February 22, 2023.
- f. The Parties have agreed that the deposition of Dr. John Alford shall take place on February 23, 2023.
- g. The Parties have agreed that the deposition of Marion Warren shall take place on March 2, 2023.
- h. The Parties have agreed that the deposition of Dr. Diane Evans shall take place on March 2, 2023.
- i. The Parties have agreed that the deposition of Blake Evans as a 30(b)(6) representative of the Secretary's office shall take place on March 9, 2023.

3. The present Motion for extension of time is not interposed for any delay or prejudice to any party and the parties have jointly agreed to this schedule to accommodate the professional and personal schedules of the individuals involved.

4. No changes to the deadlines for motions for summary judgment or other dates in the scheduling order is required or requested.

5. Accordingly, the Parties respectfully request that the Court enter an Order extending the discovery deadline through and including March 9, 2023 for the limited purpose of conducting depositions as stipulated herein.

6. A proposed order is attached for the Court's convenience.

This 17th day of February, 2023.

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
Elizabeth W. Vaughan
Assistant Attorney General
Georgia Bar No. 762715
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. 687600
fstrickland@taylorenghish.com
Bryan F. Jacoutot
Georgia Bar No. 668272
bjacoutot@taylorenghish.com
Diane Festin LaRoss

Georgia Bar No. 430830
dlaross@taylorenghish.com
Donald P. Boyle, Jr.
Georgia Bar No. 073519
dboyle@taylorenghish.com
Daniel H. Weigel
Georgia Bar No. 956419
dweigel@taylorenghish.com
TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Telephone: (678) 336-7249

Attorneys for Defendants

Dated: February 17, 2023

By: **Adam M. Sparks**
Joyce Gist Lewis
Georgia Bar No. 296261
Adam M. Sparks
Georgia Bar No. 341578
KREVOLIN & HORST, LLC
One Atlantic Center
1201 West Peachtree Street, NW,
Suite 3250
Atlanta, Georgia 30309
Telephone: (404) 888-9700
Facsimile: (404) 888-9577
Email: JLewis@khlawfirm.com
Email: Sparks@khlawfirm.com

Respectfully submitted,

Abha Khanna*
Jonathan P. Hawley*
Makeba A.K. Rutahindurwa*
ELIAS LAW GROUP LLP
1700 Seventh Avenue,
Suite 2100
Seattle, Washington 98101
Phone: (206) 656-0177
Facsimile: (206) 656-0180
Email: AKhanna@elias.law
Email: JHawley@elias.law
Email: MRutahindurwa@elias.law

Michael B. Jones
Georgia Bar No. 721264
ELIAS LAW GROUP LLP
250 Massachusetts Avenue NW,
Suite 400
Washington, D.C. 20001

Phone: (202) 968-4490
Facsimile: (202) 968-4498
Email: MJones@elias.law

Counsel for Plaintiffs

*Admitted *pro hac vice*

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing MOTION 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

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

COAKLEY PENDERGRASS et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as the Georgia
Secretary of State, et al.,

Defendants.

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

ANNIE LOIS GRANT et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as the Georgia
Secretary of State, et al.,

Defendants.

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

**[PROPOSED]
ORDER JOINT MOTION TO EXTEND DISCOVERY DEADLINE FOR
LIMITED PURPOSE OF TAKING DEPOSITIONS**

Having reviewed and considered the parties' Joint Motion to Extend Discovery Deadline for Limited Purpose of Taking Depositions, and for good cause shown, the Court GRANTS the motion. It is hereby ORDERED that the discovery deadline in the above-captioned cases is extended through and

including March 9, 2023 for the limited purpose of conducting depositions as set forth and stipulated in the Motion.

SO ORDERED this ____ day of February, 2023.

STEVE C. JONES
United States District Judge