

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

	)	
	)	
ALPHA PHI ALPHA FRATERNITY INC. et al.,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	CIVIL ACTION FILE
	)	1:21-CV-05337-SCJ
BRAD RAFFENSPERGER, in his official capacity as the Secretary of State of Georgia,	)	
	)	
<i>Defendant.</i>	)	

**JOINT MOTION TO AMEND STIPULATION AND ORDER REGARDING  
DISCOVERY**

Plaintiffs Alpha Phi Alpha Fraternity Inc., Sixth District of the African Methodist Episcopal Church, Eric T. Woods, Katie Bailey Glenn, Phil Brown, and Janice Stewart, and Defendant Brad Raffensperger, in his official capacity as the Georgia Secretary of State, entered into a stipulation and order regarding the schedule for discovery in this case on October 6, 2022, which the court approved on October 7, 2022. *See* Dkt. 164. According to that schedule, fact depositions for Plaintiffs, Defendants, and third parties are to be held by December 16, 2022. *Id.* at 3. Fact depositions for persons associated with the Office of the Georgia Secretary of State are to be held by January 10, 2023. *Id.*

The parties have worked diligently to set depositions on the previously entered schedule, but require a short extension of time to (1) accommodate the existing commitments of certain deponents; (2) ensure that the parties have sufficient time to meet and confer regarding the Rule 30(b)(6) notices they have issued; and (3) coordinate the depositions of third parties who have

received subpoenas in this case; *Georgia State Conference of the NAACP et al. v. State of Georgia et al.*, Case No. 1:21-CV-5338 (N.D. Ga.); *Pendergrass et al. v. Raffensperger et al.*, Case No. 1:21-cv-05339 (N.D. Ga.); and *Grant et al. v. Raffensperger et al.*, Case No. 1:22-cv-00122 (N.D. Ga.).

To that end, the parties jointly move this Court to amend the prior stipulation and order to permit fact depositions for (1) persons associated with the Office of the Georgia Secretary of State and Plaintiffs' Rule 30(b)(6) designees until January 13, 2023; and (2) third parties until January 20, 2023.

Respectfully submitted this 15th day of December, 2022.

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**[PROPOSED] ORDER GRANTING JOINT MOTION TO AMEND STIPULATION AND  
ORDER REGARDING DISCOVERY**

Having reviewed the Joint Motion to Amend Stipulation and Order Regarding Discovery, the Court **GRANTS** the motion. Fact depositions for persons associated with the Office of the Georgia Secretary of State and Plaintiffs’ Rule 30(b)(6) designees may be held until January 13, 2023; and fact depositions for third parties may be held until January 20, 2023.

**SO ORDERED** this \_\_\_\_ day of December, 2022.

\_\_\_\_\_  
**STEVE C. JONES**  
  
United States District Judge